



Air Permit

AIR PA 049

AIR PA #: DB0378S 081652

File Type: Permits

Volume: 001

Date: 1/1/2007 -

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**THE FOLLOWING DOCUMENT CONTAINS PAGES THAT HAVE BEEN
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**IN ORDER TO IDENTIFY POOR QUALITY DOCUMENTS THEY HAVE
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Kathleen Hartnett White, *Chairman*
Larry R. Soward, *Commissioner*
H. S. Buddy Garcia, *Commissioner*
Glenn Shankle, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Protecting Texas by Reducing and Preventing Pollution

May 8, 2007

MR DAVID FUELLEMAN
PLANT MANAGER
BUILDING MATERIALS CORPORATION OF AMERICA
PO BOX 655607
DALLAS TX 75265-5607

Standard Permit Registration Number:	81652
Renewal Date:	May 8, 2017
Location:	2600 Singleton Boulevard
City/County:	Dallas, Dallas County
Project Description/Unit:	Replacement of the Line 1 and Line 3 Asphalt Coaters Electrostatic Precipitator (ESP) with Two Coalescing Filter Mist Elimination Systems
Regulated Entity Number:	RN100788959
Customer Reference Number:	CN602717464
New or Existing Site:	Existing
Affected Permit (if applicable):	7711A
Standard Permit Type:	Pollution Control Project

Building Materials Corporation of America has registered the emissions associated with the replacement of the Line 1 and Line 3 asphalt coaters ESP with two coalescing filter mist elimination systems under the standard permit listed above as authorized by the Commissioners pursuant to Title 30 Texas Administrative Code § 116.602 (30 TAC § 116.602). The ESP is now a back-up control device as indicated in the registration. Emissions are listed on the attached table. For rule information see www.tceq.state.tx.us/permitting/air/nav/standard.html. You are reminded that 30 TAC § 116.615 requires that any construction or change authorized by this standard permit should be consolidated into the affected facilities' permit(s) at the next amendment or renewal.

The company is also reminded that these facilities may be subject to and must comply with other state and federal air quality requirements. If you have questions, please contact Mr. Jonathan Wilmoth, P.E. at (512) 239-0567. This action is taken under authority delegated by the Executive Director of the TCEQ.

Sincerely,

A handwritten signature in black ink, appearing to read "Anne M. Inman".

Anne M. Inman, P.E., Manager
General/Standard/Rule (GSR) Permit Section
Air Permits Division

cc: Section Manager, Air Pollution Control Program, City of Dallas Environmental and Health Services, Dallas
Air Section Manager, Region 4 - Fort Worth

Project Number: 128705

RECEIVED
JUL 05 2007
TCEQ
CENTRAL FILE ROOM

Standard Permit Maximum Emission Rates Table
Permit Number 81652

The facilities and emissions included in this table have been represented and reviewed as the maximum emissions authorized by this standard permit registration.

MAXIMUM EMISSION RATES TABLE												
EPN/Emission Source	VOC *		NO _x *		CO *		PM ₁₀ *		SO ₂ *		Other	
	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy
CFL / Coalescing Filter Mist Elimination Systems (to control emissions from the Line 1 and Line 3 Asphalt Coaters)	5.76	25.23					3.43	15.02				
TOTAL EMISSIONS (TPY):	5.76	25.23					3.43	15.02				

The maximum operating schedule represented for these facilities is:

hours/day	days/week	weeks/year	hours/year
24	7	52	8,760

- * VOC - volatile organic compounds
- PM₁₀ - particulate matter equal to or less than 10 microns in size
- NO_x - total oxides of nitrogen
- CO - carbon monoxide
- SO₂ - sulfur dioxide

TECHNICAL REVIEW: STANDARD PERMIT FOR POLLUTION CONTROL PROJECTS

Permit No.:	81652	Company Name:	Building Materials Corporation of America	APD Reviewer:	Mr. Jonathan Wilmoth, P.E.
Project No.:	128705	Site/Area Name:	Replacement of Line 1 and Line 3 Asphalt Coating ESP with Two Coalescing Filter Mist Elimination Systems	SP No.:	6001

GENERAL INFORMATION					
Regulated Entity No.:	RN100788959	Project Type:	Standard Permit Application		
Customer Reference No.:	CN602717464	Date Received by TCEQ:	April 16, 2007		
Account No.:	DB-0378-S	Date Received by Reviewer:	April 20, 2007		
City/County:	Dallas, Dallas County	Physical Location:	2600 Singleton Boulevard		

CONTACT INFORMATION					
Responsible Official/ Primary Contact Name and Title:	Mr. David Fuelleman Plant Manager	Phone No.:	(214) 637-1060	Email:	
		Fax No.:	(214) 637-5202		
Technical Contact/ Consultant Name and Title:	Mr. Jim Hill Maintenance Manager	Phone No.:	(214) 637-8985	Email:	
		Fax No.:	(214) 637-5202		

GENERAL RULES CHECK	YES	NO	COMMENTS
Is confidential information included in the application?		X	
Are there associated authorizations at the site?	X		NSR 7711A According to company, no PBRs or standard permits associated with this registration.
Is the application for renewal of an existing standard permit?		X	
Will any New Source Review permit be directly affected by this project?	X		If YES, list the NSR Permit No.: 7711A
Do NSPS, NESHAP, or MACT standards apply to this registration?	X		If YES, list Subparts: NSPS UU for Line 3
Is the following documentation included with this registration? 1. The General Requirements Checklist demonstrating compliance with 30 TAC §§ 116.110 and 116.601-615 2. Process description 3. Project description 4. Descriptions of any equipment being installed 5. Emissions calculations including the basis of the calculations 6. Emission increases and/or decreases associated with this project (quantified) 7. Description of efforts to minimize any collateral emissions or collateral increases	X		
Are any requirements of § 116.110 circumvented by: (1) artificially limiting feed or production rates below the maximum capacity of the project's equipment; (2) claiming a limited chemical list; or (3) dividing and registering a project in separate segments?		X	

STANDARD PERMIT RULES CHECK	YES	NO	COMMENTS
Will the project include replacement of existing pollution control equipment and/or techniques?	X		If YES, is the new control technique at least as effective? Yes.
Will an increase in production capacity result from the installation of control equipment or the implementation of a control technique?		X	
Does the project include installing a new production facility, reconstructing an existing production facility [as defined in 40 CFR § 60.15(b)(1) and (c)], or completely replacing an existing production facility?		X	
Without consideration of any other increases or decreases, will the project result in a significant net increase in emissions of any criteria pollutant?		X	
Are predictable maintenance, startup, and shutdown emissions directly associated with the pollution control project included in this project?	X		The company indicates that MSS does not change the character of emissions and that MSS emissions do not exceed normal operation emissions as listed in the table below.

DESCRIBE OVERALL PROCESS AT THE SITE
The company manufactures asphalt shingles at this site.

DESCRIBE PROJECT AND INVOLVED PROCESS
The company has submitted a pollution control standard permit registration to replace an existing electrostatic precipitator (ESP) on the Line 1 and Line 3 asphalt coaters with two coalescing filter mist elimination systems (one for each Line). The company refers to the filters as the "Ceco Filter System."
The company indicates the Ceco Filters will be routed to one EPN, same elevation, within a few feet of, the EPN for the ESP.

TECHNICAL REVIEW: STANDARD PERMIT FOR POLLUTION CONTROL PROJECTS

Permit No.:	81652	Company Name:	Building Materials Corporation of America	APD Reviewer:	Mr. Jonathan Wilmoth, P.E.
Project No.:	128705	Site/Area Name:	Replacement of Line 1 and Line 3 Asphalt Coating ESP with Two Coalescing Filter Mist Elimination Systems	SP No.:	6001

TECHNICAL SUMMARY - DESCRIBE HOW THE PROJECT MEETS THE RULES

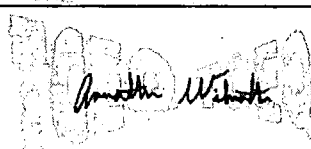
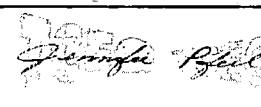
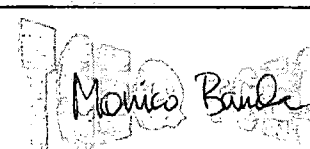
The company represents that PM10 emissions from the Ceco filters are based on stack test data from a similar operation at the company's Minneapolis, Minnesota, site. The company represents that VOC emissions are based on AP-42; according to the company, the Ceco Filter System "closely resembles" the high-energy air filter (HEAF) in AP-42. Based on calculations submitted by the company, actual PM10 emissions should be much less than the emissions represented in the table below.

COMMUNICATION LOG

Date	Time	Name/Company	Subject of Communication
The following communications were not entered as tracking elements in the NSR IMS due to the nature of the communications.			
04/30/2007	3:45 PM	Mr. Jim Hill / Mr. Doug Harris / GAF Materials	The reviewer called. Project could not be located in house. Project many pages? No. Fax or e-mail a copy? Yes.
05/01/2007	3:17 PM	Ms. Christine M. Otto / Trinity Consultants	E-mail received - information will be e-mailed tomorrow.
05/02/2007	11:20 AM	Ms. Christine M. Otto / Trinity Consultants	Ms. Otto left a message. Changes need to be made to the information. How?
05/02/2007	12:15 PM	Ms. Christine M. Otto / Trinity Consultants	The reviewer called. Based on information from Ms. Otto, address changes in body of e-mail.
05/02/2007			E-mail of registration, with changes in body of the e-mail, received.
05/03/2007	2:00 PM	Ms. Christine M. Otto / Trinity Consultants	The reviewer left a message for Ms. Otto. Body of e-mail indicates change from two new stacks (CFL1 and CFL3) to one new stack. Reviewer will use EPN CFL in the letter for the new stack. Contact reviewer if unacceptable.
05/03/2007			E-mail received - acceptable.

ESTIMATED EMISSIONS

EPN/Emission Source	Specific VOC or Other Pollutants	VOC		NO _x		CO		PM ₁₀		SO ₂		Other	
		lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy
New Emissions													
CFL / Coalescing Filter Mist Elimination Systems (to control emissions from the Line 1 and Line 3 Asphalt Coaters)		5.76	25.23					3.43	15.02				
Old Emissions (Authorized under NSR 7711A verified on May 03, 2007.)													
34 / Electrostatic Precipitator (back-up to control Line 1 and Line 3 Asphalt Coaters)		5.76	25.23					3.43	15.02				
NET CHANGE IN EMISSIONS:		0	0					0	0				
TOTAL NEW EMISSIONS (TPY):		5.76	25.23					3.43	15.02				
MAXIMUM OPERATING SCHEDULE:		Hours/Day			Days/Week			Weeks/Year			Hours/Year		8760

	TECHNICAL REVIEWER	PEER REVIEWER	FINAL REVIEWER
SIGNATURE:			
PRINTED NAME:	Mr. Jonathan Wilmoth, P.E.	Ms. Jennifer Pfeil	Mr. Monica Banda
DATE:	05/04/2007	05/04/2007	05/04/07

TECHNICAL REVIEW: STANDARD PERMIT FOR POLLUTION CONTROL PROJECTS

Permit No.:	81652	Company Name:	Building Materials Corporation of America	APD Reviewer:	Mr. Jonathan Wilmoth, P.E.
Project No.:	128705	Site/Area Name:	Replacement of Line 1 and Line 3 Asphalt Coating ESP with Two Coalescing Filter Mist Elimination Systems	SP No.:	6001

BASIS OF PROJECT POINTS	POINTS
<i>Base Points:</i> Pollution Control Standard Permit (6001)	1.0
<i>Project Complexity Description and Points:</i> Search for project and phone calls	0.5
Technical Reviewer Project Points Assessment:	1.5
Final Reviewer Project Points Confirmation:	1.5

05/07/2007 ----- NSR PERMITS IMS- PROJECT RECORD -----

PROJECT#: 128705 PERMIT#: 81652 STATUS: P DISP CODE: 2RECEIVED: 04/16/2007 PROJTYPE: JRVW RENEWAL: 5/7/07FEE DATE: FEE AMT: \$ 900 PROJ-ISSUE DATE: 5/7/07

STDY,PBR#,STDP: 6001 CHECK NUMBER: 573285

PROJECT NAME: TWO COALESCING FILTER MIST ELIMINATION SYSTEMS

GROUP: PAR

PAR1_2 : BOWERS, JOHNNY

GROUP: ART

TECHENGR : WILMOTH, JONATHAN

ADMIN REVIEW

A - PAR RECEIVED : 04/16/2007 A - PAR TRANSFER TO APD : 04/18/2007 A - TELECONS : 04/18/2007

A - CENTRAL
REGISTRY UPDATED : 04/18/2007

ISSUED TO: BUILDING MATERIALS CORPORATION OF AMERICA

COMPANY NAME: BUILDING MATERIALS CORPORATION OF AMERICA

CUSTOMER REGISTRY ID: CN602717464

PRIMARY CONTACT INFORMATION

CONTACT TYPE: TECHNICAL CONTACT

NAME: MR JIM HILL

TITLE: MAINTENANCE MANAGER

EMPLOYER NAME: BUILDING MATERIALS CORPORATION OF AMERICA

PHONE: 214-637-8985 ext

FAX: 214-637-5202 ext

STREET: PO BOX 655607

CITY/STATE, ZIP: DALLAS, TX , 75265-5607

CONTACT TYPE: RESPONSIBLE OFFICIAL

NAME: MR DAVID FUELLEMAN

TITLE: PLANT MANAGER

EMPLOYER NAME: BUILDING MATERIALS CORPORATION OF AMERICA

PHONE: 214-637-1060 ext

FAX: 214-637-5202 ext

STREET: PO BOX 655607

CITY/STATE, ZIP: DALLAS, TX , 75265-5607

PROJECT INFORMATION

UNIT: REPLACEMENT OF LINE 1 AND LINE 3 ASPHALT COATERS ESP WITH TWO COALESCING FILTER MIST ELIMINATION SYS

SIC: 2952 REGION: 4 ACCOUNT: DB0378S

REG ENTITY ID:
RN100788959

SITE NAME: GAF MATERIALS

COUNTY: DALLAS

CAPUNITS:

UNITTYPE:

CAPACITY:

CITY: DALLAS

LOCATION: 2600 SINGLETON BOULEVARD

PUBLIC NOTICE

04/18/2007 ----- NSR PERMITS IMS- PROJECT RECORD -----

PROJECT#: 128705 PERMIT#: 81652 STATUS: P DISP CODE: _____
RECEIVED: 04/16/2007 PROJTYPE: JRVW RENEWAL: _____
FEE DATE: FEE AMT: \$ 900 PROJ-ISSUE DATE: _____
STD#,PBR#,STDP: 6001 CHECK NUMBER: 573285
PROJECT NAME: TWO COALESCING FILTER MIST ELIMINATION SYSTEMS

GROUP: PAR

PAR1_2 : BOWERS, JOHNNY

GROUP: ART

TECHENGR : WILMOTH, JONATHAN *Howard***ADMIN REVIEW**

A - PAR RECEIVED : 04/16/2007 A - PAR TRANSFER TO 04/18/2007 A - TELECONS : 04/18/2007
APD :
A - CENTRAL
REGISTRY UPDATED : 04/18/2007

ISSUED TO: BUILDING MATERIALS CORPORATION OF AMERICA
COMPANY NAME: BUILDING MATERIALS CORPORATION OF AMERICA
CUSTOMER REGISTRY ID: CN602717464

PRIMARY CONTACT INFORMATION

CONTACT TYPE: TECHNICAL CONTACT

NAME: MR JIM HILL

TITLE: MAINTENANCE MANAGER

EMPLOYER NAME: BUILDING MATERIALS CORPORATION OF AMERICA

PHONE: 214-637-8985 ext

FAX: 214-637-5202 ext

STREET: PO BOX 655607

CITY/STATE, ZIP: DALLAS, TX , 75265-5607

CONTACT TYPE: RESPONSIBLE OFFICIAL

NAME: MR DAVID FUELLEMAN

TITLE: PLANT MANAGER

EMPLOYER NAME: BUILDING MATERIALS CORPORATION OF AMERICA

PHONE: 214-637-1060 ext

FAX: 214-637-5202 ext

STREET: PO BOX 655607

CITY/STATE, ZIP: DALLAS, TX , 75265-5607

PROJECT INFORMATION

UNIT: TWO COALESCING FILTER MIST ELIMINATION SYSTEMS

SIC: 2952 REGION: 4 ACCOUNT: DB0378S

REG ENTITY ID:
RN100788959

SITE NAME: GAF MATERIALS

COUNTY: DALLAS

CAPUNITS:

UNITTYPE:

CAPACITY:

CITY: DALLAS

LOCATION: 2600 SINGLETON BOULEVARD

PUBLIC NOTICE

PUBLIC NOTICE REQUIRED?: PN1 ALT LANGUAGE: NO PN2 ALT LANGUAGE: NO

**EMISSION
RATES**

TONS/YR REDUCTION	NOX	CO	VOC	PM	SO2	OTHER	TOTAL
-------------------	-----	----	-----	----	-----	-------	-------

PROJECT NOTES

TECHNICAL ACTIVITY HISTORYTR - ENGINEER
RECEIVE PROJECT : 4-20SUP - RECEIVED 4-19
FROM PAR :TR - PROJECT TO
ADMIN :TR - FINAL PKG TO
TEAM LEADER :TR - DEFICIENCY
CYCLE :TR - INITIAL
REVIEW
COMPLETE : 4/24

TR - PEER REVIEW :

PROJECT ATTRIBUTES

PROJECT LINK

PROJECTS/PERMITS VOIDANCE

Johnny Bowers - NSR Numbers

From: Johnny Bowers
To: WWW - REGISTRY
Date: 4/18/2007 2:57 PM
Subject: NSR Numbers

RN100788959
GAF Materials
CN602717464
Building Materials Corporation of America

Please add the following:

Air NSR - 81652 - Registration - Pending

APIRT has original

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
TELEPHONE MEMO TO THE FILE

Please complete with typewriter or black pen.

Call to: Christine O'Leary

Call from: _____

Date of call: 4/18/7

File no.: _____

Phone no.: (972) 461 8100

Subject: _____

Information for file: Re name? Building Materials, especially of Am...

Signed _____

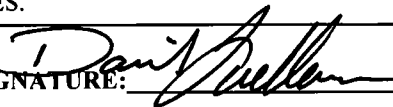


Texas Commission on Environmental Quality
Registration for Air Standard Permit
Form PI-1S

I. REGISTRANT INFORMATION			
A. Is a TCEQ Core Data Form (TCEQ Form No. 10400) attached		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <i>If "NO," please indicate the following.</i>	
Customer Reference No.: CN600474753		Regulated Entity No.: RN100788959	
B. Company or Other Legal Customer Name (must be same as Core Data "Customer"): Building Materials Corporation of America			
Company Official Contact Name: David Fuelleman		Title: Plant Manager	
Mailing Address: P. O. Box 655607			
City: Dallas		State: Texas	Zip Code: 75212
Phone No.: 214-637-1060		Fax No.: 214-637-5202	E-mail: DFuelleman@gaf.com
C. Technical Contact Name: Jim Hill		Title: Maintenance Manager	
Company: Building Materials Corporation			
Mailing Address: P.O. Box 655607			
City: Dallas		State: Texas	Zip Code: 75212
Phone No.: 214-637-8985		Fax No.: 214-637-5202	E-mail: JHill@gaf.com
D. Facility Location Information (Street Address): 2600 Singleton Boulevard			
If no street address, provide written driving directions to the site: (Attach description if additional space is needed.)			
City: Dallas		County: Dallas	Zip Code: 75212
II. FACILITY AND SITE INFORMATION			
A. Name and Type of Facility:		<input checked="" type="checkbox"/> PERMANENT <input type="checkbox"/> PORTABLE	
B. Type of Action	<input checked="" type="checkbox"/> Initial Application	<input checked="" type="checkbox"/> Change to Registration	Registration No.: 7711A
		<input type="checkbox"/> Renewal	Expiration Date:
C. Standard Permit claimed (check one):		<input checked="" type="checkbox"/> 6001 Pollution Control Project	<input type="checkbox"/> 6002 Oil and Gas Facilities
		<input type="checkbox"/> 6003 MSW Landfill	
<input type="checkbox"/> 6005 Electric Generating Facilities		<input type="checkbox"/> 6007 Permanent Hot Mix Asphalt Plants or Temporary Hot Mix Asphalt Plants	
D. Are you registering a grandfathered facility?		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
E. Is there a previous Standard Exemption or Permit by Rule for the facilities in this registration? (Attach details regarding changes)		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	If "YES," list Registration No.:
			If "YES," list Rule No.:
F. Are there any other facilities at this site which are authorized by an air Standard Permit?		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	If "YES," list Permit No.:
G. Are there any other air preconstruction permits at this site?		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	If "YES," list Permit No.:
H. Is this site required to obtain an air federal operating permit?		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	If "YES," list Permit No.: O-2771
I. TCEQ Account Identification Number (if known):		DB-0378-S	
III. FEE INFORMATION			
Check/Money Order/Transaction No.: 573285		Name on Check: Trinity Consultants	Fee Amount: \$900.00



**Texas Commission on Environmental Quality
Registration for Air Standard Permit
Form PI-1S**

IV. TECHNICAL INFORMATION INCLUDING STATE AND FEDERAL REGULATORY REQUIREMENTS <i>Registrants must be in compliance with all applicable state and federal regulations and standards to claim a Standard Permit.</i>		
A. Is confidential information submitted and properly marked with this registration?	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
B. Is a process flow diagram or a process description attached?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
C. Is a plot plan attached?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
D. Are emissions data and calculations for this claim attached?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
E. Is information attached showing how the general requirements and applicability (30 TAC § 116.610 and 116.615) are met?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
F. Is information attached showing how the specific requirements are met?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
V. SIGNATURE REQUIREMENTS <i>If this project has a capital cost of more than \$2,000,000.00, this application must be submitted under seal of a Registered Texas Professional Engineer (P.E.) or the appropriate exemption is claimed pursuant to the Texas Engineering Practice Act</i>		
The signature below indicates that I have knowledge of the facts herein set forth and that the same are true and correct to the best of my knowledge and belief. I further state that to the best of my knowledge and belief, the project for which application is made will not in any way violate any provision of the Texas Water Code (TWC), Chapter 7, Texas Clean Air Act (TCAA), as amended, or any of the air quality rules and regulations of the Texas Commission on Environmental Quality or any local governmental ordinance or resolution enacted pursuant to the TCAA. I further state that I have read and understand TWC §§ 7.177-7.183, which defines CRIMINAL OFFENSES for certain violations, including intentionally or knowingly making or causing to be made false material statements or representations in this application, and TWC §§ 7.187, pertaining to CRIMINAL PENALTIES.		
PRINT NAME: <u>David Fuelleman</u>	SIGNATURE: <u></u>	DATE: <u>10-Jan-07</u>
<small>NOTE: ORIGINAL SIGNATURE IN INK IS REQUIRED</small>		
VI. COPIES OF THE REGISTRATION		
Copies must be sent as listed below. Processing delays will occur if copies are not sent as noted.		
Air Permits Initial Review Team (APIRT)	Regular, Certified, Priority Mail MC 161, P.O. Box 13087, Austin, Texas 78711-3087 Hand Delivery, Overnight Mail MC 161, 12100 Park 35 Circle, Building C, Third Floor, Austin, Texas 78753 (512) 239-1250	Original Money Order or Check, a Copy of Form PI-1S and Core Data Form; all attachments
Revenue Section, TCEQ	Regular, Certified, Priority Mail MC 161, P.O. Box 13087, Austin, Texas 78711-3087 Hand Delivery, Overnight Mail MC 161, 12100 Park 35 Circle, Building C, Third Floor, Austin, Texas 78753 (512) 239-1250	Original Money Order or Check, a Copy of Form PI-1S and Core Data Form
Appropriate TCEQ Regional Office	To find your regional office address, go to the TCEQ Web site at www.tceq.state.tx.us , or call (512) 239-1250	Copy of Form PI-1S, Core Data Form, and all attachments
Appropriate Local Air Pollution Control Program(s)	To find your local air pollution control programs go to the TCEQ, APD Web site at www.tceq.state.tx.us/nav/permits/air_permits.html , or call (512) 239-1250	Copy of Form PI-1S, Core Data Form, and all attachments





Air Quality Standard Permits (SP)
State Pollution Control Project Requirements Checklist
Title 30 Texas Administrative Code §§116.610-116.617

Electronic Submittal — Complete this document and attach to e-mail along with PI-1S submittal.

Hard-Copy Submittal — Print and complete the following checklist and attach to PI-1S submittal.

Check the most appropriate answer and include any additional information in the spaces provided. If additional space is needed, please include an extra page and reference the rule number. The SP forms, tables, checklists, and guidance documents are available from the TCEQ, Air Permits Division web site at: www.tceq.state.tx.us/permitting/air/nav/standard.html.

This Standard Permit requires registration with the commission's Office of Permitting, Remediation, and Registration in Austin. The facilities and/or changes to facilities can be registered by completing a **Form PI-1S**, "Registration for Air Standard Permit." This checklist should accompany the registration form.

CHECK THE MOST APPROPRIATE ANSWERS AND FILL IN THE BLANKS			
Rule	Questions/Description	Information	Response
116.617	Have you completed the Standard Permit General Requirements Checklist?		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
116.617 (d)(2)(C)	Please list all existing permits and registrations affected by this project and attach a description of how the standard permit will be administratively incorporated into the existing permit(s).	List all existing permits:	Permit 7711A
116.617 (a)(1)	Will this project reduce or maintain currently authorized emission rates for facilities authorized by a permit or standard permit?		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
116.617 (b)(5)	If "NO," are any increases solely due to the SP project?		<input type="checkbox"/> YES <input type="checkbox"/> NO
116.617 (a)(3)(A)	Will this project include completely replacing or reconstructing an existing production facility? If "YES," you may not claim this standard permit.		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
116.617 (a)(3)(C)	Will implementing this project serve to return a facility or group of facilities to compliance with an existing authorization or permit? If "YES," you cannot use this SP, you must amend the facility's original permit or authorization.		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
116.617 (a)(1)	Is this pollution control project undertaken voluntarily?		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
116.617 (a)(1)	Is this pollution control project undertaken to meet a governmental standard? If "YES," list governmental standard:		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
116.617 (d)(2)(D)	Will the project result in any changes to currently authorized emission rates? If "YES," attach documentation listing affected EPNs and rate changes.		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO





Air Quality Standard Permits (SP)
State Pollution Control Project Requirements Checklist
Title 30 Texas Administrative Code §§116.610-116.617

CHECK THE MOST APPROPRIATE ANSWERS AND FILL IN THE BLANKS			
Rule	Questions/Description	Information	Response
116.617 (a)(2) (A-B)	Are you implementing or changing a method of control? <i>If "YES," have you demonstrated equivalence or improvement in attached documentation?</i>		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
116.617 (a)(2)(C)	Are you substituting a compound in a manufacturing process? <i>If "YES," have you demonstrated equivalence or improvement in attached documentation?</i>		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> YES <input type="checkbox"/> NO
116.617 (b)(2)	Will construction or implementation of the pollution control project begin within 180 days of receiving written acceptance of the registration from the executive director?		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
116.617 (b)(4)	Are predictable maintenance, startup, and shutdown emissions directly associated with the pollution control project included in this project? <i>If "YES," attach documentation showing that MSS was authorized under the existing permit or authorization.</i>	Please see the attached application	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
116.617 (b)(5)	Are all capacity increases solely due to the project as represented in the registration application? <i>If "NO," you may not claim this standard permit.</i>	Not Applicable	<input type="checkbox"/> YES <input type="checkbox"/> NO
116.617 (c)(1-3)	Are you replacing emissions control equipment (like-kind replacements or upgrades)? <i>If "NO," skip to next question.</i> <i>If "YES," have you demonstrated equivalence or improvement in attached documentation?</i> Will current testing and record keeping requirements be appropriate for the new control equipment or technique? <i>If "NO," have you attached details of any proposed changes?</i>		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> YES <input type="checkbox"/> NO

12770 Merit Drive, Suite 900, Dallas, TX 75251 U.S.A. ■ (972) 661-8100 ■ Fax (972) 385-9203

April 13, 2007

Air Permits Initial Review Team (APIRT)
Texas Commission on Environmental Quality
Mail Code 161, Building C, Third Floor
12100 Park 35 Circle
Austin, TX 78753

RE: *Standard Permit Registration – Pollution Control Project
Building Materials Corporation of America – Dallas Plant – Dallas County
TCEQ Account No. DB-0378-S, CN 600474753, RN 100788959*

To Whom It May Concern:

Building Materials Corporation of America doing business as GAF Materials Corporation (GAF) owns and operates an asphalt roofing production facility located in Dallas, Texas (Dallas Plant). With this letter GAF is submitting a Pollution Control Project Standard Permit registration. With this registration GAF is proposing to install two (2) Coalescing Filter Mist Elimination Systems (Coalescing Filter Systems) to replace the existing Electrostatic Precipitator (ESP) controlling emissions from the Line 1 and Line 3 Asphalt Coaters. The proposed voluntary pollution control project will meet all of the requirements under Title 30 of the Texas Administrative Code (30 TAC) Chapter 116, Section 617.

A check payable to the Texas Commission on Environmental Quality (TCEQ) in the amount of \$900.00 for the Standard Permit registration has been remitted directly to the TCEQ Revenue Section.

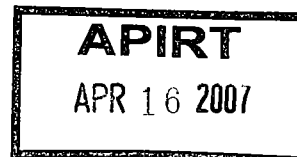
If you have any questions regarding this Standard permit registration fee, please call Mr. Doug Harris of GAF at (214) 637-8909 or me at (972) 661-8100.

Sincerely,

TRINITY CONSULTANTS



Christine M. Otto
Managing Consultant

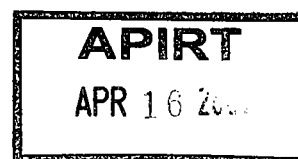


Attachments

cc: Mr. Tony Walker, TCEQ Regional Office 4
Mr. David Miller, City of Dallas Environmental and Health Services
Mr. Doug Harris, GAF Materials Corp.

APIRT – Page 2
April 13, 2007

Mr. Fred Bright, GAF Materials Corp.
Dr. Chintan Mehta, Trinity Consultants



**TCEQ AIR QUALITY STANDARD PERMIT REGISTRATION
POLLUTION CONTROL PROJECT
BUILDING MATERIALS CORPORATION OF AMERICA ■ DALLAS PLANT**

**TCEQ ACCOUNT NO. DB-0378-S
TCEQ CUSTOMER REFERENCE NUMBER (CN) 600474753
TCEQ REGULATED ENTITY REFERENCE NUMBER (RN) 100788959
TCEQ NSR PERMIT NO. 7711A
DALLAS COUNTY, TEXAS**

Prepared by:

GAF MATERIALS CORPORATION
2600 Singleton Blvd.
Dallas, Texas 75212
(214) 637-1060

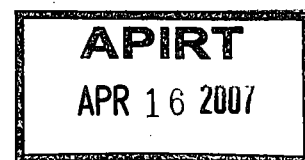
TRINITY CONSULTANTS
12770 Merit Dr.
Suite 900
Dallas, Texas 75251
(972) 661-8100

Fred Bright ■ Director of Environmental Engineering

**Christine Otto ■ Managing Consultant
Chintan Mehta ■ Consultant**

April 2007

Project 064401.0118



Trinity
Consultants

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1. EXECUTIVE SUMMARY

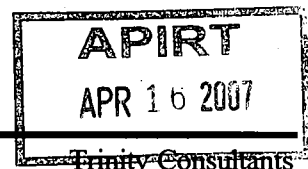
Building Materials Corporation of America doing business as GAF Materials Corporation (GAF) owns and operates an existing asphalt roofing production facility located in Dallas, Texas (Dallas Plant). The Texas Commission on Environmental Quality (TCEQ) Account No. for the Dallas Plant is DB-0378-S. GAF operates under TCEQ Customer Reference Number (CN) 600474753 and the Dallas Plant operates under TCEQ Regulated Entity Reference Number (RN) 100788959. The Dallas Plant has been issued TCEQ Permit No. 7711A (air quality construction permit) for the existing roof shingle manufacturing plant, with additional support equipment authorized by Permit-by-Rule (PBR).

Dallas County is currently an attainment or unclassified area for all criteria pollutants except the 8-hour ozone standard for which it has been designated a moderate nonattainment area.¹ The Dallas Plant is an existing minor source with respect to Prevention of Significant Deterioration (PSD) and a major source with respect to the federal operating permits program (Title V) due to potential emissions of particulate matter with an aerodynamic diameter of less than or equal to 10 microns (PM_{10}).

With this Standard Permit for a Pollution Control Project application, GAF is proposing to replace the existing Electrostatic Precipitator (ESP) controlling emissions from the Line 1 and Line 3 Asphalt Coaters, as authorized by Permit No. 7711A [Emission point Number (EPN) 34], with two (2) Coalescing Filter Mist Elimination Systems (Coalescing Filter Systems), which are similar to a high-energy air filter (HEAF). The Coalescing Filter Systems will be dedicated filter units; one for each production line (EPN-CFL1 for Line 1 and EPN-CFL3 for Line 3).

Total emissions of PM_{10} and volatile organic compounds (VOC) from the proposed Coalescing Filter Systems will be similar to the current ESP. The existing ESP emissions are based on total emissions from the Line 1 and Line 3 production lines venting from a single discharge point (EPN-34). The proposed arrangement will route emissions from the Line 1 and Line 3 production lines to two separate discharge points (EPN-CFL1 and EPN-CFL3). The total emissions from the Dallas Plant's coating operation (per hour and per year) will remain unchanged. The asphalt fumes controlled by the Coalescing Filters will still be derived from the identical production lines and will not change due to a change in the control device.

¹ The United States Protection Agency (U.S. EPA) Green Book. Source: <http://www.epa.gov/oar/oaqps/greenbk/>, accessed on December 11, 2006.



2. TCEQ FORM AND CHECKLIST

2. TCEQ FORM AND CHECKLIST

FORM PI - 1S

STATE POLLUTION CONTROL PROJECT REQUIREMENTS CHECKLIST

3. PERMIT FEE

In accordance with 30 TAC §116.614, a standard permit fee of \$900 has been submitted to the TCEQ. The original check has been mailed to the TCEQ Revenue Section under separate cover. A copy of the check is provided in this section.

April 13, 2007

Revenue Section
Texas Commission on Environmental Quality
Mail Code 161, Building C, Third Floor
12100 Park 35 Circle
Austin, TX 78753

RE: *Standard Permit Registration Fee – Pollution Control Project
Building Materials Corporation of America – Dallas Plant – Dallas County
TCEQ Account No. DB-0378-S, CN 600474753, RN 100788959*


To Whom It May Concern:

Please find in Attachment 1 of this letter a Pollution Control Project Standard Permit registration fee for Building Materials Corporation of America doing business as GAF Materials Corporation (GAF) in the amount of \$900.00 for the Standard Permit registration.

If you have any questions regarding this Standard permit registration fee, please call Mr. Doug Harris of GAF at (214) 637-8909 or me at (972) 661-8100.

Sincerely,

TRINITY CONSULTANTS



Christine M. Otto
Managing Consultant

Attachments

cc: Mr. Tony Walker, TCEQ Regional Office 4
Mr. David Miller, City of Dallas Environmental and Health Services
Mr. Doug Harris, GAF Materials Corp.
Mr. Fred Bright, GAF Materials Corp.
Dr. Chintan Mehta, Trinity Consultants



Texas Commission on Environmental Quality
Registration for Air Standard Permit
Form PI-1S

I. REGISTRANT INFORMATION			
A. Is a TCEQ Core Data Form (TCEQ Form No. 10400) attached		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO If "NO," please indicate the following.	
Customer Reference No.: CN600474753		Regulated Entity No.: RN100788959	
B. Company or Other Legal Customer Name (must be same as Core Data "Customer"): Building Materials Corporation			
Company Official Contact Name: David Fuelleman		Title: Plant Manager	
Mailing Address: P. O. Box 655607			
City: Dallas	State: Texas	Zip Code: 75212	
Phone No.: 214-637-1060	Fax No.: 214-637-5202	E-mail: DFuelleman@gaf.com	
C. Technical Contact Name: Jim Hill		Title: Maintenance Manager	
Company: Building Materials Corporation			
Mailing Address: P.O. Box 655607			
City: Dallas	State: Texas	Zip Code: 75212	
Phone No.: 214-637-8985	Fax No.: 214-637-5202	E-mail: JHill@gaf.com	
D. Facility Location Information (Street Address): 2600 Singleton Boulevard			
If no street address, provide written driving directions to the site: (Attach description if additional space is needed.)			
City: Dallas	County: Dallas	Zip Code: 75212	
II. FACILITY AND SITE INFORMATION			
A. Name and Type of Facility:		<input checked="" type="checkbox"/> PERMANENT	<input type="checkbox"/> PORTABLE
B. Type of Action	<input checked="" type="checkbox"/> Initial Application	<input checked="" type="checkbox"/> Change to Registration	Registration No.: 7711A
		<input type="checkbox"/> Renewal	Expiration Date:
C. Standard Permit claimed (check one):		<input checked="" type="checkbox"/> 6001 Pollution Control Project	<input type="checkbox"/> 6002 Oil and Gas Facilities
		<input type="checkbox"/> 6003 MSW Landfill	
<input type="checkbox"/> 6005 Electric Generating Facilities		<input type="checkbox"/> 6007 Permanent Hot Mix Asphalt Plants or Temporary Hot Mix Asphalt Plants	
D. Are you registering a grandfathered facility?		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
E. Is there a previous Standard Exemption or Permit by Rule for the facilities in this registration? (Attach details regarding changes)		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	If "YES," list Registration No.:
			If "YES," list Rule No.:
F. Are there any other facilities at this site which are authorized by an air Standard Permit?		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	If "YES," list Permit No.:
G. Are there any other air preconstruction permits at this site?		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	If "YES," list Permit No.:
H. Is this site required to obtain an air federal operating permit?		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	If "YES," list Permit No.: O-2771
I. TCEQ Account Identification Number (if known):		DB-0378-S	
III. FEE INFORMATION			
Check/Money Order/Transaction No.: 575285		Name on Check: Trinity Consultants	Fee Amount: \$900.00



Texas Commission on Environmental Quality
Registration for Air Standard Permit
Form PI-1S

IV. TECHNICAL INFORMATION INCLUDING STATE AND FEDERAL REGULATORY REQUIREMENTS <i>Registrants must be in compliance with all applicable state and federal regulations and standards to claim a Standard Permit.</i>					
A. Is confidential information submitted and properly marked with this registration?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO				
B. Is a process flow diagram or a process description attached?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO				
C. Is a plot plan attached?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO				
D. Are emissions data and calculations for this claim attached?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO				
E. Is information attached showing how the general requirements and applicability (30 TAC § 116.610 and 116.615) are met?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO				
F. Is information attached showing how the specific requirements are met?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO				
V. SIGNATURE REQUIREMENTS <i>If this project has a capital cost of more than \$2,000,000.00, this application must be submitted under seal of a Registered Texas Professional Engineer (P.E.) or the appropriate exemption is claimed pursuant to the Texas Engineering Practice Act.</i>					
<p>The signature below indicates that I have knowledge of the facts herein set forth and that the same are true and correct to the best of my knowledge and belief. I further state that to the best of my knowledge and belief, the project for which application is made will not in any way violate any provision of the Texas Water Code (TWC), Chapter 7, Texas Clean Air Act (TCAA), as amended, or any of the air quality rules and regulations of the Texas Commission on Environmental Quality or any local governmental ordinance or resolution enacted pursuant to the TCAA. I further state that I have read and understand TWC §§ 7.177-7.183, which defines CRIMINAL OFFENSES for certain violations, including intentionally or knowingly making or causing to be made false material statements or representations in this application, and TWC §§ 7.187, pertaining to CRIMINAL PENALTIES.</p>					
<table style="width: 100%; border: none;"><tr><td style="width: 40%; border: none;">PRINT NAME: <u>David Fuelleman</u></td><td style="width: 40%; border: none;">SIGNATURE: <u><i>David Fuelleman</i></u></td><td style="width: 20%; border: none;">DATE: <u>10-Jan-07</u></td></tr></table>			PRINT NAME: <u>David Fuelleman</u>	SIGNATURE: <u><i>David Fuelleman</i></u>	DATE: <u>10-Jan-07</u>
PRINT NAME: <u>David Fuelleman</u>	SIGNATURE: <u><i>David Fuelleman</i></u>	DATE: <u>10-Jan-07</u>			
NOTE: ORIGINAL SIGNATURE IN INK IS REQUIRED					
VI. COPIES OF THE REGISTRATION					
Copies must be sent as listed below. Processing delays will occur if copies are not sent as noted.					
Air Permits Initial Review Team (APIRT)	Regular, Certified, Priority Mail MC 161, P.O. Box 13087, Austin, Texas 78711-3087 Hand Delivery, Overnight Mail MC 161, 12100 Park 35 Circle, Building C, Third Floor, Austin, Texas 78753 (512) 239-1250	Original Money Order or Check, a Copy of Form PI-1S and Core Data Form; all attachments			
Revenue Section, TCEQ	Regular, Certified, Priority Mail MC 161, P.O. Box 13087, Austin, Texas 78711-3087 Hand Delivery, Overnight Mail MC 161, 12100 Park 35 Circle, Building C, Third Floor, Austin, Texas 78753 (512) 239-1250	Original Money Order or Check, a Copy of Form PI-1S and Core Data Form			
Appropriate TCEQ Regional Office	To find your regional office address, go to the TCEQ Web site at www.tceq.state.tx.us , or call (512) 239-1250	Copy of Form PI-1S, Core Data Form, and all attachments			
Appropriate Local Air Pollution Control Program(s)	To find your local air pollution control programs go to the TCEQ, APD Web site at www.tceq.state.tx.us/nav/permits/air_permits.html , or call (512) 239-1250	Copy of Form PI-1S, Core Data Form, and all attachments			

ATTACHMENT 1

STANDARD PERMIT FEE CHECK

4. PROCESS DESCRIPTION

Building Materials Corporation or GAF is a nationwide manufacturer of building material products. The GAF Dallas Plant manufactures asphalt shingles for the roofing industry. A process flow diagram for Lines 1 and 3 asphalt coaters is included in the next Section.

4.1 ASPHALT SHINGLE MANUFACTURING

In the manufacture of asphalt roofing products, a dry non-woven fiberglass mat is fed into the roofing machine from an unwind stand. A mechanical splicer and an accumulator are provided so that the rolls can be fed in sequence by splicing without interruption of the operation. The unwind stand and the accumulator are vented to a dust collector.

The fiberglass mat is next carried through the coating section, where coating asphalt mixed with stabilizer (i.e., limestone) is applied to both surfaces of the mat. The asphalt fumes from this section of the machine from both production lines, are currently vented to a common Electrostatic Precipitator (ESP) and are proposed to be vented to two separate dedicated coalescing filter units; one for each production line.

The coating section is immediately followed by the surfacing section. In the surfacing area, ceramic colored granules are blended and dropped in proper sequence onto the coated web and embedded. The back surface of the sheet is sprinkled with sand to prevent it from adhering to rolls and to itself in the finished package. This area is vented through an assortment of hoods to a dust collector.

The hot sheet, now with a mineralized surface, then goes into the cooling section of the machine. Cooling is achieved by passing the web over a series of water-cooled drums, through water mist sprays and between air jets. It is then accumulated in festoons in the looper section of the machine to provide surge capacity required prior to cutting. Water vapors in these areas are vented to the atmosphere. Asphalt based self-seal striping dots are then applied to the bottom surface of the shingle, and the sheet is cut into shingles and automatically packaged.

4.2 SUPPORT OPERATIONS

There are six major production support operations at the GAF Dallas plant: (1) asphalt storage, (2) asphalt blowing, (3) back surfacing and granule storage, (4) stabilizer storage, (5) stabilizer heating, and (6) stabilizer and coating asphalt mixing.

Air emissions from asphalt storage and asphalt blowing are routed to a thermal oxidizer with a 96 percent destruction efficiency. The thermal oxidizer is directed to a waste heat boiler to produce steam. The waste heat boiler has an auxiliary boiler equipped with a 15 MMBtu/hr natural gas burner that is fired, if necessary to meet the plant's steam production requirements.

Sand and granules are transferred from the sand storage silo and the granule storage silo to the corresponding sand and granule bins located over the roofing machine. Air emissions from back surfacing storage (i.e., sand) and granule storage are routed to a dust collector as mentioned above.

Stabilizer is received in bulk by truck or railcar and is unloaded into storage silos. Air emissions from the stabilizer storage silos are vented to dust collectors.

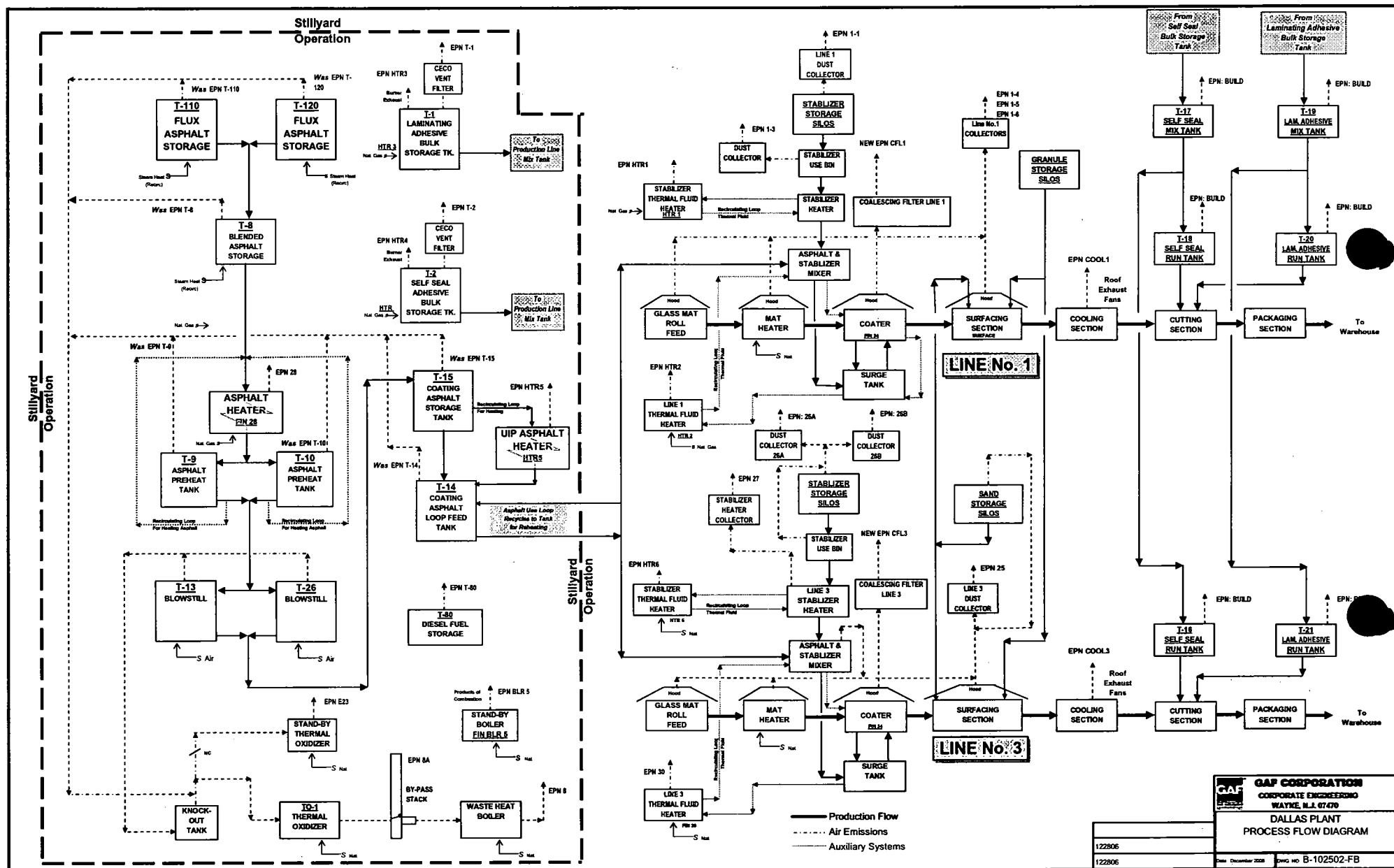
Stabilizer in the stabilizer storage silos is conveyed into a stabilizer heater. Air emissions resulting from the heating of the stabilizer are routed to a dust collector. After heating, the stabilizer is conveyed to a mixer where it is mixed with blown coating asphalt. Air emissions from the mixer are routed to a dust collector.

The mixture of heated stabilizer and the coating asphalt is transferred to surge tanks and recirculated through the coater. The emissions from the coater are currently controlled by an ESP. The control efficiency of the ESP is 95 percent. With this standard pollution control project, GAF is proposing to route the asphalt fume emissions from the Line 1 and Line 3 asphalt coaters to separate dedicated coalescing filter units.

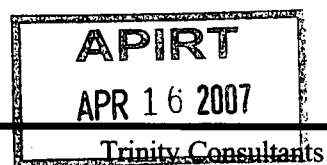
4.3 PROPOSED COALESCING FILTER SYSTEM

The proposed coalescing filters will consist of a fiber bed mist elimination system used for controlling asphalt aerosol emissions and an exhaust fan with an approximate flow rate of 7,000 acfm. Typical removal efficiency for <3 microns approaches 99.5% by weight. The fiber bed filter system employs highly efficient filtration technology to control liquid and aerosol emissions. These have been used over many years to control emissions effectively and economically.

5. PROCESS FLOW DIAGRAM



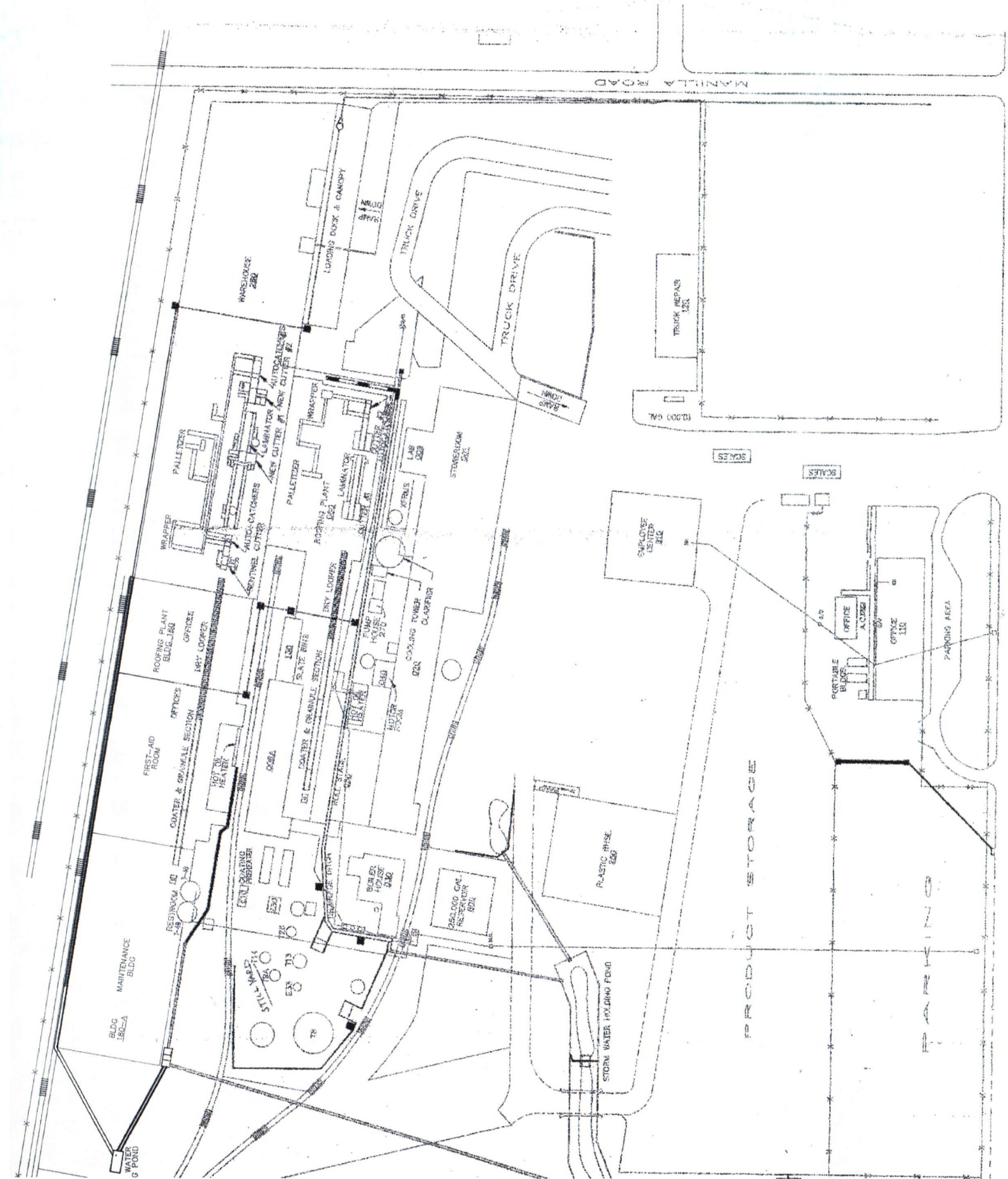
6. PLOT PLAN



BEST POSSIBLE IMAGE

5
1000 5000 5

Plant Layout



7. EMISSIONS DATA

This section provides the emissions data required by the TCEQ PI-1S. The proposed voluntary pollution control project will not result in an increase in the production capacity. The proposed Coalescing Filter Systems will result in similar or reduced emissions from the Line 1 and Line 3 asphalt coaters. It is proposed that the existing emission point, EPN-34, be replaced with two (2) new emission points (EPN-CFL1 and EPN-CFL3), representing the exhaust vents from the two new coalescing filters.

Stack test data from a similar filter system on an asphalt coater line at GAF's Minneapolis Plant was used for emissions of PM.² The controlled emission factor from the Minneapolis plant's stack test was 0.0002 lb of PM per ton of product produced. Lines 1 and 3 of the GAF Dallas Plant are used to manufacture roofing shingles. Per Permit No. 7711A, the GAF Dallas Plant has a maximum allowable production rate (Line 1 and Line 3 combined) of 171 tons per hour (tph) of finished shingles and 1,498,000 tons per year (tpy) of finished shingles. Utilizing the PM stack test data and the maximum finished product for the site, the hourly and annual emissions from the proposed Coalescing Filter System are estimated as shown below.

$$PTE_{CoalescingFilterSystem} = \left(\frac{0.0002 \text{ lb PM}}{\text{ton product produced}} \right) \times 171 \left(\frac{\text{ton product}}{\text{hr}} \right) = 0.034 \left(\frac{\text{lb}}{\text{hr}} \right)$$

$$PTE_{CoalescingFilterSystem} = 0.034 \left(\frac{\text{lb}}{\text{hr}} \right) \times 8,760 \left(\frac{\text{hr}}{\text{yr}} \right) \times \left(\frac{1 \text{ ton}}{2,000 \text{ lb}} \right) = 0.150(\text{tpy})$$

The stack testing on the Minneapolis Plant did not include VOC. Therefore, GAF is proposing to show the currently authorized VOC emissions from the ESP will be similar to the VOC emissions from the Coalescing Filter System based on emission factors developed for AP-42.

Based on GAF's experience, the VOC emissions from the proposed pollution control project will be lower than the current VOC permitted emissions. This can be further asserted from the AP-42 Section 11.2 Asphalt Roofing. Since the Coalescing Filter System closely resembles the high-energy air filter (HEAF), the VOC emissions factor for the HEAF from the AP-42 Manual was compared to the ESP factor. Table 7-1 compares the emission factors for VOC from the ESP and HEAF.³

² Per email correspondence from Mr. Fred Bright (GAF) to Ms. Christine Otto (Trinity Consultants) on November 27, 2006, the controlled emission factor for PM is 0.0002 lbs of pollutant/ton of product produced. This is based on stack testing conducted in 2004 on coalescing filter on coater in the GAF Minneapolis Plant.

³ U.S. EPA, Office of Air Quality Planning and Standard Compilation of Air Pollutant Emission Factors, (Volume 1, Fifth Edition), Section 11.2, Table 11.2-4 Emission Factors for Asphalt Roofing, January 1995.

TABLE 7-1. EMISSION FACTORS FOR ASPHALT ROOFING

Process	TOC^a (lb/ton finished product)
Shingle saturation: dip saturator, drying-in drum section, wet looper, and coater with ESP (SCC 3-05-001-16)	0.098
Shingle saturation: dip saturator, drying-in drum section, and wet looper with HEAF (SCC 3-05-001-18)	0.094

^a Total organic compounds as measured with an EPA Method 25A (or equivalent) sampling train.

As seen from the above table, the AP-42 emission factors are slightly less for the HEAF when compared with an ESP. Therefore, GAF expects that upon completion of the proposed pollution control project, the VOC emissions will show similar trends with AP-42 and will result in VOC emissions less than those currently emitted by the ESP. Thus, GAF would like to maintain the total allowable VOC emissions as stipulated in the April 2006 permit amendment application.⁴ GAF is willing to conduct stack testing once the proposed pollution abatement equipment is in operation to demonstrate compliance with the permit limits.

As the asphalt is processed in the coating operation, the asphalt fumes will be controlled by the two proposed coalescing filters. GAF is proposing that the emissions from the Line 1 and Line 3 Coalescing Filter Systems be based on prorated values from the current permit allowable for the Electrostatic Precipitator (EPN-34) as shown in Tables 7-2 and 7-3. Emissions from routine maintenance, start-up, and shutdown (MSS) from the Asphalt Coaters are not expected to be different than normal operations.

⁴ TCEQ Air Quality Permit Amendment Application for GAF Materials Corporation (Dallas Plant), submitted to TCEQ on April 5, 2006.

TABLE 7-2. CURRENT ELECTROSTATIC PRECIPITATOR HOURLY EMISSIONS

Current Control Device	PM ₁₀	VOC *
Electrostatic Precipitator (EPN-34)	3.43 lb/hr	5.76 lb/hr

* The VOC emissions are referenced in the Permit Amendment Application submitted to the TCEQ in April 2006.

TABLE 7-3. PROPOSED EMISSIONS FOR LINE 1 AND LINE 3 COALESCING FILTER SYSTEMS

Production Line	Permitted Asphalt Usage (lb/hr)	% of Total Asphalt Usage	PM ₁₀	VOC	7610 VOC	
Line 1 Asphalt Coater	24,886	37.5 %	1.29	2.16	5.63	9.46
Line 3 Asphalt Coater	41,472	62.5 %	2.14	3.60	9.39	15.77
Total	66,358	100.0 %	3.43	5.76	15.02	25.23

TPV
(annex 2)

8. GENERAL REQUIREMENTS

This section provides a summary demonstration that the proposed pollution control project at GAF will meet all requirements of 30 TAC §116.610 and §116.615.

8.1 30 TAC §116.610. APPLICABILITY EFFECTIVE FEBRUARY 1, 2006

- (a) Under the Texas Clean Air Act, §382.051, a project that meets the requirements for a standard permit listed in this subchapter or issued by the commission is hereby entitled to the standard permit, provided the following conditions listed in this section are met. For the purposes of this subchapter, project means the construction or modification of a facility or a group of facilities submitted under the same registration.

- (1) Any project which results in a net increase in emissions of air contaminants from the project other than carbon dioxide, water, nitrogen, methane, ethane, hydrogen, oxygen, or those for which a national ambient air quality standard has been established must meet the emission limitations of §106.261 of this title (relating to Facilities (Emission Limitations), unless otherwise specified by a particular standard permit.

The emissions limitations of 30 TAC §106.261 do not apply to the proposed pollution control project pursuant to 30 TAC §116.617(b)(3).

- (2) Construction or operation of the project must be commenced prior to the effective date of a revision to this subchapter under which the project would no longer meet the requirements for a standard permit.

Construction and operation of the proposed pollution control project will be commenced prior to the effective date of a revision to this subchapter so that the requirements for the standard permit are met.

- (3) The proposed project must comply with the applicable provisions of the Federal Clean Air Act, §111 (concerning New Source Performance Standards) as listed under 40 Code of Federal Regulations (CFR) Part 60, promulgated by the United States Environmental Protection Agency (EPA).

Line 3 of the GAF Dallas Plant is applicable to NSPS UU Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture. GAF will comply with all requirements.

APIRT

APR 16 2007

- (4) The proposed project must comply with the applicable provisions of FCAA, §112 (concerning Hazardous Air Pollutants) as listed under 40 CFR 61, promulgated by the EPA.

The proposed project is not subject to any National Emission Standard for Hazardous Air Pollutants (NESHAP) codified in 40 CFR 61.

- (5) The proposed project must comply with the applicable maximum achievable control technology standards as listed under 40 CFR Part 63, promulgated by the EPA under FCAA, §112 or as listed under Chapter 113, Subchapter C of this title (relating to National Emissions Standards for Hazardous Air Pollutants for Source Categories (FCAA §112, 40 CFR 63)).

The proposed pollution control project is not subject to any NESHAP codified in 40 CFR 63.

- (6) If subject to Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program) the proposed facility, group of facilities, or account must obtain allocations to operate.

GAF, including the proposed pollution control project, is not subject to the requirements of 30 TAC Chapter 101, Subchapter H, Division 3.

- (b) Any project that constitutes a new major stationary source or major modification as defined in §116.12 of this title (relating to Nonattainment and Prevention of Significant Deterioration Review Definitions) is subject to the requirements of §116.110 of this title (relating to Applicability) rather than this subchapter.

The proposed pollution control project does not constitute a new major stationary source or major modification as defined in §116.12. Therefore, this project is not subject to the requirements of 30 TAC §116.110.

- (c) Persons may not circumvent by artificial limitations the requirements of §116.110 of this title.

Artificial limitations have not been used to circumvent the requirements of §116.110.

- (d) Any project involving a proposed affected source (as defined in §116.15(1) of this title (relating to Section 112(g) Definitions)) shall comply with all applicable requirements under Subchapter E of this chapter (relating to Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources (FCAA, §112(g), 40 CFR Part 63)). Affected sources subject to Subchapter E of this chapter may use a standard permit under this subchapter only if the terms and conditions of the specific standard permit meet the requirements of Subchapter E of this chapter.

The proposed pollution control project does not have the potential to emit 10 tpy of any hazardous air pollutant (HAP) or 25 tpy of any combination of HAPs. Therefore, the requirements of Subchapter E of 30 TAC 116 are not applicable to this project.

8.2 30 TAC §116.615. GENERAL CONDITIONS

EFFECTIVE SEPTEMBER 12, 2002

The following general conditions are applicable to holders of standard permits, but will not necessarily be specifically stated within the standard permit document.

- (1) Protection of public health and welfare. The emissions from the facility, including dockside vessel emissions, must comply with all applicable rules and regulations of the commission adopted under Texas Health and Safety Code, Chapter 382, and with intent of the TCAA, including protection of health and property of the public.

This project represents a voluntary pollution control project that will potentially lower actual emissions for a facility previously authorized by TCEQ permit, thereby ensuring the protection of public health and welfare. This standard permit registration documents that the proposed project will comply with the rules and regulations of the TCEQ and the intent of the TCAA.

- (2) Standard permit representations. All representations with regard to construction plans, operating procedures, and maximum emission rates in any registration for a standard permit become conditions upon which the facility or changes thereto, must be constructed and operated. It is unlawful for any person to vary from such representations if the change will affect that person's right to claim a standard permit under this section. Any change in condition such that a person is no longer eligible to claim a standard permit under this section requires proper authorization under §116.110 of this title (relating to Applicability). If the facility remains eligible for a standard permit, the owner or operator of the facility shall notify the executive director of any change in conditions which will result in a change in the method of control of emissions, a change in the character of the emissions, or an increase in the discharge of the various emissions as compared to the representations in the original registration or any previous notification of a change in representations. Notice of changes in representations must be received by the executive director no later than 30 days after the change.

GAF understands that standard permit representations become conditions upon which the facility must be operated. Any changes to the representations in this application will be communicated to the TCEQ.

- (3) Standard permit in lieu of permit amendment. All changes authorized by standard permit to a facility previously permitted under §116.110 of this title (relating to Applicability) shall be administratively incorporated into that facility's permit at such time as the permit is amended or renewed.

GAF will provide information sufficient to incorporate this Standard Permit into TCEQ Permit No. 7711A at the time of renewal or amendment.

- (4) Construction progress. Start of construction, construction interruptions exceeding 45 days, and completion of construction shall be reported to the appropriate regional office not later than 15 working days after occurrence of the event, except where a different time period is specified for a particular standard permit.

GAF will notify the appropriate TCEQ Regional Office of construction progress as required.

- (5) Start-up notification.

(A) The appropriate air program regional office of the commission and any other air pollution control program having jurisdiction shall be notified prior to the commencement of operations of the facilities authorized by a standard permit in such a manner that a representative of the executive director may be present.

(B) For phased construction, which may involve a series of units commencing operations at different times, the owner or operator of the facility shall provide separate notification for the commencement of operations for each unit.

(C) Prior to beginning operations of the facilities authorized by the permit, the permit holder shall identify to the Office of Permitting, Remediation, and Registration the source or sources of allowances to be utilized for compliance with Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program).

(D) A particular standard permit may modify start-up notification requirements.

GAF will provide start-up notification as required by the Standard Permit.

- (6) Sampling requirements. If sampling of stacks or process vents is required, the standard permit holder shall contact the Office of Air Quality and any other air pollution control program having jurisdiction prior to sampling to obtain the proper data forms and procedures. All sampling and testing procedures must be approved by the executive director and coordinated with the regional representatives of the commission. The standard permit holder is also responsible for providing sampling facilities and conducting the sampling operations or contracting with an independent sampling consultant.

If stack sampling is required by the executive director, GAF will comply with these stack sampling requirements.

- (7) Equivalency of methods. The standard permit holder shall demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods, and monitoring methods proposed as alternatives to methods indicated in the conditions of the standard permit. Alternative methods must be applied for in writing and must be

reviewed and approved by the executive director prior to their use in fulfilling any requirements of the standard permit.

GAF is not requesting any alternatives to emissions control methods, sampling or other emission testing methods, and monitoring methods indicated in the conditions of the standard permit. GAF understands that if changes are proposed, equivalency of methods will be required.

- (8) Recordkeeping. A copy of the standard permit along with information and data sufficient to demonstrate applicability of and compliance with the standard permit shall be maintained in a file at the plant site and made available at the request of representatives of the executive director, the EPA, or any air pollution control program having jurisdiction. For facilities that normally operate unattended, this information shall be maintained at the nearest staffed location within Texas specified by the standard permit holder in the standard permit registration. This information must include, but is not limited to, production records and operating hours. Additional recordkeeping requirements may be specified in the conditions of the standard permit. Information and data sufficient to demonstrate applicability of and compliance with the standard permit must be retained for at least two years following the date that the information or data is obtained. The copy of the standard permit must be maintained as a permanent record.

GAF will maintain records as required by the Standard Permit and make them available to representatives of the executive director, the EPA, or any local pollution control program.

- (9) Maintenance of emission control. The facilities covered by the standard permit may not be operated unless all air pollution emission capture and abatement equipment is maintained in good working order and operating properly during normal facility operations. Notification for emissions events and scheduled maintenance shall be made in accordance with §101.201 and §101.211 of this title (relating to Emissions Event Reporting and Recordkeeping Requirements; and Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping).

GAF will maintain the air pollution capture and abatement equipment for the facilities covered by this standard permit in good working order and will operate the air pollution capture and abatement equipment properly during normal facility operations. Notifications under 30 TAC § 101.201 and §101.211 will be made, as appropriate.

- (10) Compliance with rules. Registration of a standard permit by a standard permit applicant constitutes an acknowledgment and agreement that the holder will comply with all rules, regulations, and orders of the commission issued in conformity with the TCAA and the conditions precedent to the claiming of the standard permit. If more than one state or federal rule or regulation or permit condition is applicable, the most stringent limit or condition shall govern. Acceptance includes consent to the entrance of commission employees and designated representatives of any air pollution control program having jurisdiction into the

permitted premises at reasonable times to investigate conditions relating to the emission or concentration of air contaminants, including compliance with the standard permit.

GAF will comply will all rules, regulations, and orders of the commission

9. SPECIFIC REQUIREMENTS

This section provides a summary demonstration that the proposed pollution control project at GAF will meet all requirements of 30 TAC §116.617.

9.1 30 TAC §116.617. STATE POLLUTION CONTROL PROJECT STANDARD PERMIT (EFFECTIVE FEBRUARY 1, 2006)

(a) Scope and applicability.

- (1) This standard permit applies to pollution control projects undertaken voluntarily or as required by any governmental standard, which reduce or maintain currently authorized emission rates for facilities authorized by a permit, standard permit, or permit by rule.

GAF is voluntarily implementing this proposed pollution control project to replace the current ESP with the Coalescing Filter Systems. The proposed project is expected to reduce or maintain currently authorized emission rates for previously authorized emissions.

- (2) The project may include:
- (A) the installation or replacement of emissions control equipment;
 - (B) the implementation or change to control techniques; or
 - (C) the substitution of compounds used in manufacturing processes.

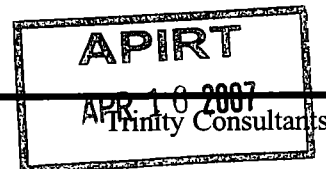
This pollution control project proposes to install pollution control equipment that will potentially result in maintaining or reducing the current authorized emissions.

- (3) This standard permit must not be used to authorize the installation of emission control equipment or the implementation of a control technique that:

- (A) constitutes the complete replacement of an existing production facility or reconstruction of a production facility as defined in 40 Code of Federal Regulations §60.15(b)(1) and (c); or

The proposed pollution control project does not include the installation of a new production facility, reconstruction of a production facility, or the complete replacement of an existing production facility.

- (B) the executive director determines there are health effects concerns or the potential to exceed a national ambient air quality standard criteria pollutant or contaminant that results from an increase in emissions of any air contaminant until those concerns are addressed by the registrant to the satisfaction of the executive director; or



The implementation of the proposed pollution control project will maintain or reduce the previously authorized emissions and is not expected to increase authorized emissions of any other criteria pollutants. Therefore, there is no potential to exceed an ambient air quality standard as a result of the project.

(C) returns a facility or group of facilities to compliance with an existing authorization or permit unless authorized by the executive director.

GAF is currently in compliance with NSR Permit No. 7711A; therefore this paragraph does not apply.

- (4) Only new or modified pollution control projects must meet the conditions of this standard permit. All previous standard permit registrations under this section that were authorized prior to the effective date of this rule must include the increases and decreases in emissions resulting from those projects in any future netting calculation and all other conditions must be met upon the ten-year anniversary and renewal of the original registration, or until administratively incorporated into the facilities' permit, if applicable.

The proposed project is a new pollution control project and meets the conditions of this standard permit.

(b) General requirements.

- (1) Any claim under this standard permit must comply with all applicable conditions of:

(A) §116.604(1) and (2) of this title (relating to Duration and Renewal of Registrations to Use Standard Permits);

GAF will comply with the renewal requirements in §116.604(1) and (2).

(B) §116.605(d)(1) and (2) of this title (relating to Standard Permit Amendment and Revocation);

GAF will comply with any amendments to the Standard Permit.

(C) §116.610 of this title (relating to Applicability);

GAF meets the conditions of §116.610 as shown in the previous Section of this application.

(D) §116.611 of this title (relating to Registration to Use a Standard Permit);

This document represents the registration to use a Standard Permit and contains all of the required elements set forth in §116.611.

(E) §116.614 of this title (relating to Standard Permit Fees); and

GAF has submitted the Standard Permit fee under separate cover. A copy of the check is included in this application.

(F) §116.615 of this title (relating to General Conditions).

GAF understands the conditions of §116.615 are General Conditions of the Standard Permit and will comply with the applicable requirements as shown in the previous Section of this application.

- (2) Construction or implementation of the pollution control project must begin within 18 months of receiving written acceptance of the registration from the executive director, with one 18-month extension available, and must comply with §116.115(b)(2) and §116.120 of this title (relating to General and Special Conditions and Voiding of Permits). Any changes to allowable emission rates authorized by this section become effective when the project is complete and operation or implementation begins.

GAF will begin construction and implementation of the pollution control project within 18 months of acceptance of this registration or will request an 18-month extension. In addition, GAF will comply with the Conditions of §116.115(b)(2) and §116.120.

- (3) The emissions limitations of §116.610(a)(1) of this title do not apply to this standard permit.

GAF understands that the requirements of 30 TAC §116.610(a)(1) are not applicable to this standard permit.

- (4) Predictable maintenance, startup, and shutdown emissions directly associated with the pollution control projects must be included in the representations of the registration application.

GAF does not anticipate an increase in allowable emissions or change in the character of the emissions during predictable maintenance, startup or shutdown (MSS) associated with the facilities directly associated with the pollution control project. Therefore, predictable MSS emissions are not separately quantified in this application.

- (5) Any increases in actual or allowable emission rates or any increase in production capacity authorized by this section (including increases associated with recovering lost production capacity) must occur solely as a result of the project as represented in the registration application. Any increases of production associated with a pollution

control project must not be utilized until an additional authorization is obtained. This paragraph is not intended to limit the owner or operator's ability to recover lost capacity caused by a derate, which may be recovered and used without any additional authorization.

There are no increases in emission rates represented in this pollution control project standard permit and there will be no increases of production as a result of the proposed project.

(c) Replacement projects.

- (1) The replacement of emissions control equipment or control technique under this standard permit is not limited to the method of control currently in place, provided that the control or technique is at least as effective as the current authorized method and all other requirements of this standard permit are met.
- (2) The maintenance, startup, and shutdown emissions may be increased above currently authorized levels if the increase is necessary to implement the replacement project and maintenance, startup, and shutdown emissions were authorized for the existing control equipment or technique.
- (3) Equipment installed under this section is subject to all applicable testing and recordkeeping requirements of the original control authorization. Alternate, equivalent monitoring, or records may be proposed by the applicant for review and approval of the executive director.

GAF is proposing to replace the existing ESP emission control equipment with the proposed Coalescing Filter Systems. The replaced control equipment will be at least as effective as or better than the current authorized control equipment. GAF will meet all the requirements for this standard permit.

(d) Registration requirements.

- (1) A registration must be submitted in accordance with the following.
 - (A) If there are no increases in authorized emissions of any air contaminant resulting from a replacement pollution control project, a registration must be submitted no later than 30 days after construction or implementation begins and the registration must be accompanied by a \$900 fee.

GAF is proposing to replace the existing ESP emission control equipment with the proposed Coalescing Filter Systems. Although only required to submit a replacement pollution control project 30 days after construction begins for projects that do not result in an increase in emissions, GAF is submitting this registration and

fee for the pollution control project at least 30 days prior to construction and implementation of the pollution control project for TCEQ approval.

(B) If a new control device or technique is authorized or if there are increases in authorized emissions of any air contaminant resulting from the pollution control project, a registration must be submitted no later than 30 days prior to construction or implementation. The registration must be accompanied by a \$900 fee. Construction or implementation may begin only after:

- (i) no written response has been received from the executive director within 30 calendar days of receipt by the Texas Commission on Environmental Quality (TCEQ); or
- (ii) written acceptance of the pollution control project has been issued by the executive director.

GAF proposes to replace the existing control equipment with the proposed Coalescing Filter Systems as mentioned in Section 9.1(d)(1)(A) above. Therefore, the provisions of this paragraph do not apply.

(C) If there are any changes in representations to a previously authorized pollution control project standard permit for which there are no increases in authorized emissions of any air contaminant, a notification or letter must be submitted no later than 30 days after construction or implementation of the change begins. No fee applies and no response will be sent from the executive director.

This registration is for a replacement pollution control project. GAF will submit a notification letter to the TCEQ within 30 days if changes to the pollution control project are required and do not result in an increase in air emissions.

(D) If there are any changes in representations to a previously authorized pollution control project standard permit that also increase authorized emissions of any air contaminant resulting from the pollution control project, a registration alteration must be submitted no later than 30 days prior to the start of construction or implementation of the change. The registration must be accompanied by a \$450 fee, unless received within 180 days of the original registration approval. Construction or implementation may begin only after:

- (i) no written response has been received from the executive director within 30 calendar days of receipt by the TCEQ; or
- (ii) written acceptance of the pollution control project has been issued by the executive director.

This registration is for a replacement pollution control project. GAF will submit a registration alteration, and \$450 fee, if applicable, to the TCEQ 30 days prior to a change in the pollution control project that results in an increase in air emissions.

GAF understands that construction of the change to the proposed pollution control project is authorized to commence after written approval notification is received from the TCEQ, or 30 days after the TCEQ receives the registration alteration, if GAF is not informed of any objections.

- (2) The registration must include the following:
- (A) a description of process units affected by the project;
 - (B) a description of the project;
 - (C) identification of existing permits or registrations affected by the project;
 - (D) quantification and basis of increases and/or decreases associated with the project, including identification of affected existing or proposed emission points, all air contaminants, and hourly and annual emissions rates;
 - (E) a description of proposed monitoring and recordkeeping that will demonstrate that the project decreases or maintains emission rates as represented; and
 - (F) a description of how the standard permit will be administratively incorporated into the existing permit(s).

This registration application contains the required information, as indicated above.

- (e) Operational requirements. Upon installation of the pollution control project, the owner or operator shall comply with the requirements of paragraphs (1) and (2) of this subsection.
- (1) General duty. The owner or operator must operate the pollution control project in a manner consistent with good industry and engineering practices and in such a way as to minimize emissions of collateral pollutants, within the physical configuration and operational standards usually associated with the emissions control device, strategy, or technique.

GAF will operate the pollution control equipment in accordance with good industry and engineering practice in order to minimize the emissions of collateral pollutants.

- (2) Recordkeeping. The owner or operator must maintain copies on site of monitoring or other emission records to prove that the pollution control project is operated consistent with the requirements in paragraph (1) of this subsection, and the conditions of this standard permit.

GAF will maintain records of any monitoring conducted to demonstrate that the pollution control project is operated in a manner consistent with good industry practices and in a way that tries to minimize emissions of collateral pollutants. In addition, the plant will maintain records to demonstrate compliance with this Standard Permit.

- (f) Incorporation of the standard permit into the facility authorization.

- (1) Any new facilities or changes in method of control or technique authorized by this standard permit instead of a permit amendment under §116.110 of this title (relating to Applicability) at a previously permitted or standard permitted facility must be incorporated into that facility's permit when the permit is amended or renewed.

GAF will incorporate this Standard Permit into NSR Permit No. 7711A at amendment or renewal as directed by the TCEQ.

- (2) All increases in previously authorized emissions, new facilities, or changes in method of control or technique authorized by this standard permit for facilities previously authorized by a permit by rule must comply with §106.4 of this title (relating to Requirements for Permitting by Rule), except §106.4(a)(1) of this title, and §106.8 of this title (relating to Recordkeeping).

This is a replacement pollution control project with emissions previously authorized under NSR Permit No. 7711A. Therefore, the provisions of §106.4 (relating to Requirements for Permitting by Rule) do not apply.

Kathleen Hartnett White, *Chairman*
Larry R. Soward, *Commissioner*
H. S. Buddy Garcia, *Commissioner*
Glenn Shankle, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

May 8, 2007

MR DAVID FUELLEMAN
PLANT MANAGER
BUILDING MATERIALS CORPORATION OF AMERICA
PO BOX 655607
DALLAS TX 75265-5607

RECEIVED

JUN 07 2007

TCEQ
CENTRAL FILE ROOM

Standard Permit Registration Number:	81652
Renewal Date:	May 8, 2017
Location:	2600 Singleton Boulevard
City/County:	Dallas, Dallas County
Project Description/Unit:	Replacement of the Line 1 and Line 3 Asphalt Coaters Electrostatic Precipitator (ESP) with Two Coalescing Filter Mist Elimination Systems
Regulated Entity Number:	RN100788959
Customer Reference Number:	CN602717464
New or Existing Site:	Existing
Affected Permit (if applicable):	7711A
Standard Permit Type:	Pollution Control Project

Building Materials Corporation of America has registered the emissions associated with the replacement of the Line 1 and Line 3 asphalt coaters ESP with two coalescing filter mist elimination systems under the standard permit listed above as authorized by the Commissioners pursuant to Title 30 Texas Administrative Code § 116.602 (30 TAC § 116.602). The ESP is now a back-up control device as indicated in the registration. Emissions are listed on the attached table. For rule information see www.tceq.state.tx.us/permitting/air/nav/standard.html. You are reminded that 30 TAC § 116.615 requires that any construction or change authorized by this standard permit should be consolidated into the affected facilities' permit(s) at the next amendment or renewal.

The company is also reminded that these facilities may be subject to and must comply with other state and federal air quality requirements. If you have questions, please contact Mr. Jonathan Wilmoth, P.E. at (512) 239-0567. This action is taken under authority delegated by the Executive Director of the TCEQ.

Sincerely,

A handwritten signature in black ink, appearing to read "A. Inman".

Anne M. Inman, P.E., Manager
General/Standard/Rule (GSR) Permit Section
Air Permits Division

cc: Section Manager, Air Pollution Control Program, City of Dallas Environmental and Health Services, Dallas
Air Section Manager, Region 4 - Fort Worth

Project Number: 128705

Standard Permit Maximum Emission Rates Table
Permit Number 81652

The facilities and emissions included in this table have been represented and reviewed as the maximum emissions authorized by this standard permit registration.

MAXIMUM EMISSION RATES TABLE												
EPN/Emission Source	VOC *		NO _x *		CO *		PM ₁₀ *		SO ₂ *		Other	
	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy
CFL / Coalescing Filter Mist Elimination Systems (to control emissions from the Line 1 and Line 3 Asphalt Coaters)	5.76	25.23					3.43	15.02				
TOTAL EMISSIONS (TPY):	5.76	25.23					3.43	15.02				

The maximum operating schedule represented for these facilities is:

hours/day	days/week	weeks/year	hours/year
24	7	52	8,760

- * VOC - volatile organic compounds
- PM₁₀ - particulate matter equal to or less than 10 microns in size
- NO_x - total oxides of nitrogen
- CO - carbon monoxide
- SO₂ - sulfur dioxide

TECHNICAL REVIEW STANDARD PERMIT FOR POLLUTION CONTROL PROJECTS

Permit No.:	81652	Company Name:	Building Materials Corporation of America	APD Reviewer:	Mr. Jonathan Wilmoth, P.E.
Project No.:	128705	Site/Area Name:	Replacement of Line 1 and Line 3 Asphalt Coating ESP with Two Coalescing Filter Mist Elimination Systems	SP No.:	6001

GENERAL INFORMATION					
Regulated Entity No.:	RN100788959	Project Type:	Standard Permit Application		
Customer Reference No.:	CN602717464	Date Received by TCEQ:	April 16, 2007		
Account No.:	DB-0378-S	Date Received by Reviewer:	April 20, 2007		
City/County:	Dallas, Dallas County	Physical Location:	2600 Singleton Boulevard		

CONTACT INFORMATION					
Responsible Official/ Primary Contact Name and Title:	Mr. David Fuelleman Plant Manager	Phone No.:	(214) 637-1060	Email:	
		Fax No.:	(214) 637-5202		
Technical Contact/ Consultant Name and Title:	Mr. Jim Hill Maintenance Manager	Phone No.:	(214) 637-8985	Email:	
		Fax No.:	(214) 637-5202		

GENERAL RULES CHECK	YES	NO	COMMENTS
Is confidential information included in the application?		X	
Are there associated authorizations at the site?	X		NSR 7711A According to company, no PBRs or standard permits associated with this registration.
Is the application for renewal of an existing standard permit?		X	
Will any New Source Review permit be directly affected by this project?	X		If YES, list the NSR Permit No.: 7711A
Do NSPS, NESHAP, or MACT standards apply to this registration?	X		If YES, list Subparts: NSPS UU for Line 3
Is the following documentation included with this registration? 1. The General Requirements Checklist demonstrating compliance with 30 TAC §§ 116.110 and 116.601-615 2. Process description 3. Project description 4. Descriptions of any equipment being installed 5. Emissions calculations including the basis of the calculations 6. Emission increases and/or decreases associated with this project (quantified) 7. Description of efforts to minimize any collateral emissions or collateral increases	X		
Are any requirements of § 116.110 circumvented by: (1) artificially limiting feed or production rates below the maximum capacity of the project's equipment; (2) claiming a limited chemical list; or (3) dividing and registering a project in separate segments?		X	

STANDARD PERMIT RULES CHECK	YES	NO	COMMENTS
Will the project include replacement of existing pollution control equipment and/or techniques?	X		If YES, is the new control technique at least as effective? Yes.
Will an increase in production capacity result from the installation of control equipment or the implementation of a control technique?		X	
Does the project include installing a new production facility, reconstructing an existing production facility [as defined in 40 CFR § 60.15(b)(1) and (c)], or completely replacing an existing production facility?		X	
Without consideration of any other increases or decreases, will the project result in a significant net increase in emissions of any criteria pollutant?		X	
Are predictable maintenance, startup, and shutdown emissions directly associated with the pollution control project included in this project?	X		The company indicates that MSS does not change the character of emissions and that MSS emissions do not exceed normal operation emissions as listed in the table below.

DESCRIBE OVERALL PROCESS AT THE SITE
The company manufactures asphalt shingles at this site.

DESCRIBE PROJECT AND INVOLVED PROCESS
The company has submitted a pollution control standard permit registration to replace an existing electrostatic precipitator (ESP) on the Line 1 and Line 3 asphalt coaters with two coalescing filter mist elimination systems (one for each Line). The company refers to the filters as the "Ceco Filter System."
The company indicates the Ceco Filters will be routed to one EPN, same elevation, within a few feet of, the EPN for the ESP.

TECHNICAL REVIEW STANDARD PERMIT FOR POLLUTION CONTROL PROJECTS

Permit No.:	81652	Company Name:	Building Materials Corporation of America	APD Reviewer:	Mr. Jonathan Wilmoth, P.E.
Project No.:	128705	Site/Area Name:	Replacement of Line 1 and Line 3 Asphalt Coating ESP with Two Coalescing Filter Mist Elimination Systems	SP No.:	6001

TECHNICAL SUMMARY - DESCRIBE HOW THE PROJECT MEETS THE RULES

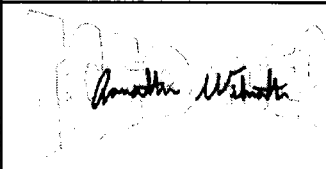
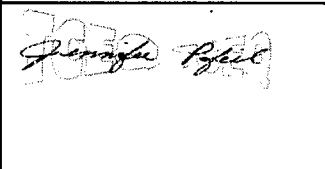

The company represents that PM10 emissions from the Ceco filters are based on stack test data from a similar operation at the company's Minneapolis, Minnesota, site. The company represents that VOC emissions are based on AP-42; according to the company, the Ceco Filter System "closely resembles" the high-energy air filter (HEAF) in AP-42. Based on calculations submitted by the company, actual PM10 emissions should be much less than the emissions represented in the table below.

COMMUNICATION LOG

Date	Time	Name/Company	Subject of Communication
The following communications were not entered as tracking elements in the NSR IMS due to the nature of the communications.			
04/30/2007	3:45 PM	Mr. Jim Hill / Mr. Doug Harris / GAF Materials	The reviewer called. Project could not be located in house. Project many pages? No. Fax or e-mail a copy? Yes.
05/01/2007	3:17 PM	Ms. Christine M. Otto / Trinity Consultants	E-mail received - information will be e-mailed tomorrow.
05/02/2007	11:20 AM	Ms. Christine M. Otto / Trinity Consultants	Ms. Otto left a message. Changes need to be made to the information. How?
05/02/2007	12:15 PM	Ms. Christine M. Otto / Trinity Consultants	The reviewer called. Based on information from Ms. Otto, address changes in body of e-mail.
05/02/2007			E-mail of registration, with changes in body of the e-mail, received.
05/03/2007	2:00 PM	Ms. Christine M. Otto / Trinity Consultants	The reviewer left a message for Ms. Otto. Body of e-mail indicates change from two new stacks (CFL1 and CFL3) to one new stack. Reviewer will use EPN CFL in the letter for the new stack. Contact reviewer if unacceptable.
05/03/2007			E-mail received - acceptable.

ESTIMATED EMISSIONS

EPN/Emission Source	Specific VOC or Other Pollutants	VOC		NO _x		CO		PM ₁₀		SO ₂		Other	
		lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy
New Emissions													
CFL / Coalescing Filter Mist Elimination Systems (to control emissions from the Line 1 and Line 3 Asphalt Coaters)		5.76	25.23					3.43	15.02				
Old Emissions (Authorized under NSR 7711A verified on May 03, 2007.)													
34 / Electrostatic Precipitator (back-up to control Line 1 and Line 3 Asphalt Coaters)		5.76	25.23					3.43	15.02				
NET CHANGE IN EMISSIONS:		0	0					0	0				
TOTAL NEW EMISSIONS (TPY):		5.76	25.23					3.43	15.02				
MAXIMUM OPERATING SCHEDULE:		Hours/Day			Days/Week			Weeks/Year			Hours/Year		8760

	TECHNICAL REVIEWER	PEER REVIEWER	FINAL REVIEWER
SIGNATURE:			
PRINTED NAME:	Mr. Jonathan Wilmoth, P.E.	Ms. Jennifer Pfeil	Mr. Monica Banda
DATE:	05/04/2007	05/04/2007	05/04/07

TECHNICAL REVIEW STANDARD PERMIT FOR POLLUTION CONTROL PROJECTS

Permit No.:	81652	Company Name:	Building Materials Corporation of America	APD Reviewer:	Mr. Jonathan Wilmoth, P.E.
Project No.:	128705	Site/Area Name:	Replacement of Line 1 and Line 3 Asphalt Coating ESP with Two Coalescing Filter Mist Elimination Systems	SP No.:	6001

BASIS OF PROJECT POINTS	POINTS
<i>Base Points:</i> Pollution Control Standard Permit (6001)	1.0
<i>Project Complexity Description and Points:</i> Search for project and phone calls	0.5
Technical Reviewer Project Points Assessment:	1.5
Final Reviewer Project Points Confirmation:	1.5

05/07/2007 ----- NSR PERMITS IMS- PROJECT RECORD -----

PROJECT#: 128705

PERMIT#: 81652

STATUS: P

DISP CODE: 2

RECEIVED: 04/16/2007

PROJTYPE: JRVW

RENEWAL: 5/1/07

FEE DATE:

FEE AMT: \$ 900

PROJ-ISSUE DATE: 5/7/07

STDY,PBR#,STDP: 6001 CHECK NUMBER: 573285

PROJECT NAME: TWO COALESCING FILTER MIST ELIMINATION SYSTEMS

GROUP: PAR

PAR1_2 : BOWERS, JOHNNY

GROUP: ART

TECHENGR : WILMOTH, JONATHAN

ADMIN REVIEW

A - PAR RECEIVED : 04/16/2007 A - PAR TRANSFER TO APD : 04/18/2007 A - TELECONS : 04/18/2007
A - CENTRAL
REGISTRY UPDATED : 04/18/2007

ISSUED TO: BUILDING MATERIALS CORPORATION OF AMERICA

COMPANY NAME: BUILDING MATERIALS CORPORATION OF AMERICA

CUSTOMER REGISTRY ID: CN602717464

PRIMARY CONTACT INFORMATION

CONTACT TYPE: TECHNICAL CONTACT

NAME: MR JIM HILL

TITLE: MAINTENANCE MANAGER

EMPLOYER NAME: BUILDING MATERIALS CORPORATION OF AMERICA

PHONE: 214-637-8985 ext

FAX: 214-637-5202 ext

STREET: PO BOX 655607

CITY/STATE, ZIP: DALLAS, TX , 75265-5607

CONTACT TYPE: RESPONSIBLE OFFICIAL

NAME: MR DAVID FUELLEMAN

TITLE: PLANT MANAGER

EMPLOYER NAME: BUILDING MATERIALS CORPORATION OF AMERICA

PHONE: 214-637-1060 ext

FAX: 214-637-5202 ext

STREET: PO BOX 655607

CITY/STATE, ZIP: DALLAS, TX , 75265-5607

PROJECT INFORMATION

UNIT: REPLACEMENT OF LINE 1 AND LINE 3 ASPHALT COATERS ESP WITH TWO COALESCING FILTER MIST ELIMINATION SYS

SIC: 2952

REGION: 4

ACCOUNT: DB0378S

REG ENTITY ID:

RN100788959

SITE NAME: GAF MATERIALS

COUNTY: DALLAS

CAPUNITS:

UNITTYPE:

CAPACITY:

CITY: DALLAS

LOCATION: 2600 SINGLETON BOULEVARD

PUBLIC NOTICE

PUBLIC NOTICE REQUIRED?: PNI ALT LANGUAGE: NO PN2 ALT LANGUAGE: NO

**EMISSION
RATES**

TONS/YR REDUCTION	NOX	CO	VOC	PM	SO2	OTHER	TOTAL
-------------------	-----	----	-----	----	-----	-------	-------

PROJECT NOTES

TECHNICAL ACTIVITY HISTORY

SUP - RECEIVED FROM PAR :	04/19/2007	TR - ENGINEER RECEIVE PROJECT :	04/20/2007	TR - INITIAL REVIEW COMPLETE :	05/03/2007
TR - FINAL PKG TO TEAM LEADER :	05/04/2007	TR - PEER REVIEW :	05/04/2007	05/04/2007	TR - PROJECT TO ADMIN : 05/07/2007

PROJECT ATTRIBUTES

PROJECT LINK

PROJECTS/PERMITS VOIDANCE

Jonathan Ray Wilmoth - Fw: Building Materials Corporation of America - GAF

From: Christine Otto <COtto@trinityconsultants.com>
To: <jwilmoth@tceq.state.tx.us>
Date: 5/3/2007 4:47 PM
Subject: Fw: Building Materials Corporation of America - GAF
CC: "Bright, Fred" <FBright@gaf.com>, <dharris@gaf.com>

81650 / 128705
 DB03785

John,

I just received your voicemail. Sorry I missed you; I was on a conference call. Combining the two Ceko Filter exhausts to 1 stack and emission point called CFL similar to our PCP application request is great.

Thank you so much.
 Christine

Christine M. Otto
 Managing Consultant
 Trinity Consultants
 (972) 661-8100 Phone
 (972) 385-9203 Fax
 cotto@trinityconsultants.com

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 MAY 03 2007
 AIR PERMITS DIVISION

----- Forwarded by Christine Otto/Trinity Consultants on 05/03/2007 02:08 PM -----

Christine Otto/Trinity Consultants

To jwilmoth@tceq.state.tx.us

05/02/2007 01:07 PM

CC "Bright, Fred" <FBright@gaf.com>, dharris@gaf.com
 Subject Building Materials Corporation of America - GAF

DOCS in MRP
 TNU = 343819
 S.H.I. etw = 343820

John,

Per my email yesterday and our call this morning, please find attached a copy of the Building Materials Corporation of America/GAF Standard Pollution Control Project application that was submitted to the TCEQ on April 13, 2007. The attached application is a copy of the original submittal with no changes as noted below. As we discussed, GAF would like modify this application with the following:

- Keep the ESP as back-up to the Ceko Filter System. The emissions indicated in the application will not change since the Ceko Filter application requested that no change to permit emission limits be made.
- Route the emissions from the Two Ceko Filters to one (1) emission point versus the two (2) indicated in the application. Please note, the filters will be routed to the same general area as the existing ESP, e.g., the two Ceko filters will run into one exhaust manifold that will be installed physically within a few feet (same elevation) of the existing ESP exhaust. As a results, the two systems (ESP and Ceko filters) will have different exhaust points, but in the same vicinity.

If there is any additional information you need or if you would like to discuss any of the attached or proposed

modifications, please do not hesitate to contact me.

Thank you,
Christine Otto

Christine M. Otto
Managing Consultant
Trinity Consultants
(972) 661-8100 Phone
(972) 385-9203 Fax
cotto@trinityconsultants.com

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From: Christine Otto <COtto@trinityconsultants.com>
To: <jwilmoth@tceq.state.tx.us>
Date: 5/2/2007 1:09:01 PM
Subject: Building Materials Corporation of America - GAF

John,

Per my email yesterday and our call this morning, please find attached a copy of the Building Materials Corporation of America/GAF Standard Pollution Control Project application that was submitted to the TCEQ on April 13, 2007. The attached application is a copy of the original submittal with no changes as noted below. As we discussed, GAF would like modify this application with the following:

Keep the ESP as back-up to the Ceco Filter System. The emissions indicated in the application will not change since the Ceco Filter application requested that no change to permit emission limits be made. Route the emissions from the Two Ceco Filters to one (1) emission point versus the two (2) indicated in the application. Please note, the filters will be routed to the same general area as the existing ESP, e.g., the two Ceco filters will run into one exhaust manifold that will be installed physically within a few feet (same elevation) of the existing ESP exhaust. As a results, the two systems (ESP and Ceco filters) will have different exhaust points, but in the same vicinity.

If there is any additional information you need or if you would like to discuss any of the attached or proposed modifications, please do not hesitate to contact me.

Thank you,
Christine Otto

Christine M. Otto
Managing Consultant
Trinity Consultants
(972) 661-8100 Phone
(972) 385-9203 Fax
cotto@trinityconsultants.com

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CC: "Bright, Fred" <FBright@gaf.com>, <dharris@gaf.com>

05/03/07

81652 / 128705

no other 81652
proposed

ESP
MSS

call C. Otto
on 05/03/07 at 2:00pm

↓
m/a. → 2 to 1 ESP

↓
now can it

ESP ⇒ CFB

let someone
know
it
program.

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Jonathan Ray Wilmoth - Building Materials Corporation of America - GAF

From: Christine Otto <COtto@trinityconsultants.com>
To: <jwilmoth@tceq.state.tx.us>
Date: 5/1/2007 3:17 PM
Subject: Building Materials Corporation of America - GAF
CC: "Bright, Fred" <FBright@gaf.com>, <dharris@gaf.com>

John,

I assisted Doug Harris and Fred Bright of GAF with the Standard Pollution Control Project application sent to TCEQ for the installation of coalescing (Ceco) filters. Doug mentioned you need a copy. I will send you an electronic copy of the entire application tomorrow. I hope this works for your schedule. If you need to reach me, please feel free to email me at the above address or call me at 972-661-8100 if you need anything additional.

Thank you,
Christine

Christine M. Otto
Managing Consultant
Trinity Consultants
(972) 661-8100 Phone
(972) 385-9203 Fax
cotto@trinityconsultants.com

11:20 am ps/or

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12770 Merit Drive, Suite 900, Dallas, TX 75251 U.S.A. ■ (972) 661-8100 ■ Fax (972) 385-9203

April 13, 2007

Air Permits Initial Review Team (APIRT)
Texas Commission on Environmental Quality
Mail Code 161, Building C, Third Floor
12100 Park 35 Circle
Austin, TX 78753

RE: Standard Permit Registration – Pollution Control Project
Building Materials Corporation of America – Dallas Plant – Dallas County
TCEQ Account No. DB-0378-S, CN 600474753, RN 100788959

To Whom It May Concern:

Building Materials Corporation of America doing business as GAF Materials Corporation (GAF) owns and operates an asphalt roofing production facility located in Dallas, Texas (Dallas Plant). With this letter GAF is submitting a Pollution Control Project Standard Permit registration. With this registration GAF is proposing to install two (2) Coalescing Filter Mist Elimination Systems (Coalescing Filter Systems) to replace the existing Electrostatic Precipitator (ESP) controlling emissions from the Line 1 and Line 3 Asphalt Coaters. The proposed voluntary pollution control project will meet all of the requirements under Title 30 of the Texas Administrative Code (30 TAC) Chapter 116, Section 617.

A check payable to the Texas Commission on Environmental Quality (TCEQ) in the amount of \$900.00 for the Standard Permit registration has been remitted directly to the TCEQ Revenue Section.

If you have any questions regarding this Standard permit registration fee, please call Mr. Doug Harris of GAF at (214) 637-8909 or me at (972) 661-8100.

Sincerely,

TRINITY CONSULTANTS



Christine M. Otto
Managing Consultant

Attachments

cc: Mr. Tony Walker, TCEQ Regional Office 4
 Mr. David Miller, City of Dallas Environmental and Health Services
 Mr. Doug Harris, GAF Materials Corp.

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APIRT - Page 2
April 13, 2007

Mr. Fred Bright, GAF Materials Corp.
Dr. Chintan Mehta, Trinity Consultants

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**TCEQ AIR QUALITY STANDARD PERMIT REGISTRATION
POLLUTION CONTROL PROJECT
BUILDING MATERIALS CORPORATION OF AMERICA ■ DALLAS PLANT**

**TCEQ ACCOUNT NO. DB-0378-S
TCEQ CUSTOMER REFERENCE NUMBER (CN) 600474753
TCEQ REGULATED ENTITY REFERENCE NUMBER (RN) 100788959
TCEQ NSR PERMIT NO. 7711A
DALLAS COUNTY, TEXAS**

Prepared by:

GAF MATERIALS CORPORATION
2600 Singleton Blvd.
Dallas, Texas 75212
(214) 637-1060

TRINITY CONSULTANTS
12770 Merit Dr.
Suite 900
Dallas, Texas 75251
(972) 661-8100

Fred Bright ■ Director of Environmental Engineering

Christine Otto ■ Managing Consultant
Chintan Mehta ■ Consultant

April 2007

Project 064401.0118

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MAY 02 2007

AIR PERMITS DIVISION



Trinity
Consultants

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1. EXECUTIVE SUMMARY

Building Materials Corporation of America doing business as GAF Materials Corporation (GAF) owns and operates an existing asphalt roofing production facility located in Dallas, Texas (Dallas Plant). The Texas Commission on Environmental Quality (TCEQ) Account No. for the Dallas Plant is DB-0378-S. GAF operates under TCEQ Customer Reference Number (CN) 600474753 and the Dallas Plant operates under TCEQ Regulated Entity Reference Number (RN) 100788959. The Dallas Plant has been issued TCEQ Permit No. 7711A (air quality construction permit) for the existing roof shingle manufacturing plant, with additional support equipment authorized by Permit-by-Rule (PBR).

Dallas County is currently an attainment or unclassified area for all criteria pollutants except the 8-hour ozone standard for which it has been designated a moderate nonattainment area.¹ The Dallas Plant is an existing minor source with respect to Prevention of Significant Deterioration (PSD) and a major source with respect to the federal operating permits program (Title V) due to potential emissions of particulate matter with an aerodynamic diameter of less than or equal to 10 microns (PM_{10}).

With this Standard Permit for a Pollution Control Project application, GAF is proposing to replace the existing Electrostatic Precipitator (ESP) controlling emissions from the Line 1 and Line 3 Asphalt Coaters, as authorized by Permit No. 7711A [Emission point Number (EPN) 34], with two (2) Coalescing Filter Mist Elimination Systems (Coalescing Filter Systems), which are similar to a high-energy air filter (HEAF). The Coalescing Filter Systems will be dedicated filter units; one for each production line (EPN-CFL1 for Line 1 and EPN-CFL3 for Line 3).

Total emissions of PM_{10} and volatile organic compounds (VOC) from the proposed Coalescing Filter Systems will be similar to the current ESP. The existing ESP emissions are based on total emissions from the Line 1 and Line 3 production lines venting from a single discharge point (EPN-34). The proposed arrangement will route emissions from the Line 1 and Line 3 production lines to two separate discharge points (EPN-CFL1 and EPN-CFL3). The total emissions from the Dallas Plant's coating operation (per hour and per year) will remain unchanged. The asphalt fumes controlled by the Coalescing Filters will still be derived from the identical production lines and will not change due to a change in the control device.

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¹ The United States Protection Agency (U.S. EPA) Green Book. Source: <http://www.epa.gov/oar/oaqps/greenbk/>, accessed on December 11, 2006.

2. TCEQ FORM AND CHECKLIST

FORM PI-1S

STATE POLLUTION CONTROL PROJECT REQUIREMENTS CHECKLIST

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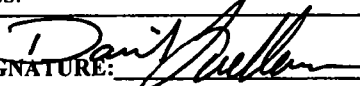


Texas Commission on Environmental Quality
Registration for Air Standard Permit
Form PI-1S

I. REGISTRANT INFORMATION			
A. Is a TCEQ Core Data Form (TCEQ Form No. 10400) attached		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <i>If "NO," please indicate the following.</i>	
Customer Reference No.: CN600474753		Regulated Entity No.: RN100788959	
B. Company or Other Legal Customer Name (must be same as Core Data "Customer"): Building Materials Corporation			
Company Official Contact Name: David Fuelleman		Title: Plant Manager	
Mailing Address: P. O. Box 655607			
City: Dallas	State: Texas	Zip Code: 75212	
Phone No.: 214-637-1060	Fax No.: 214-637-5202	E-mail: DFuelleman@gaf.com	
C. Technical Contact Name: Jim Hill		Title: Maintenance Manager	
Company: Building Materials Corporation			
Mailing Address: P.O. Box 655607			
City: Dallas	State: Texas	Zip Code: 75212	
Phone No.: 214-637-8985	Fax No.: 214-637-5202	E-mail: JHill@gaf.com	
D. Facility Location Information (Street Address): 2600 Singleton Boulevard			
If no street address, provide written driving directions to the site: (Attach description if additional space is needed.)			
City: Dallas	County: Dallas	Zip Code: 75212	
II. FACILITY AND SITE INFORMATION			
A. Name and Type of Facility:		<input checked="" type="checkbox"/> PERMANENT <input type="checkbox"/> PORTABLE	
B. Type of Action	<input checked="" type="checkbox"/> Initial Application	<input checked="" type="checkbox"/> Change to Registration	Registration No.: 7711A
	<input type="checkbox"/> Renewal	Expiration Date:	
C. Standard Permit claimed (check one):		<input checked="" type="checkbox"/> 6001 Pollution Control Project	<input type="checkbox"/> 6002 Oil and Gas Facilities
<input type="checkbox"/> 6005 Electric Generating Facilities		<input type="checkbox"/> 6003 MSW Landfill	
<input type="checkbox"/> 6007 Permanent Hot Mix Asphalt Plants or Temporary Hot Mix Asphalt Plants			
D. Are you registering a grandfathered facility?		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
E. Is there a previous Standard Exemption or Permit by Rule for the facilities in this registration? (Attach details regarding changes)		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	If "YES," list Registration No.: If "YES," list Rule No.:
F. Are there any other facilities at this site which are authorized by an air Standard Permit?		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	If "YES," list Permit No.:
G. Are there any other air preconstruction permits at this site?		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	If "YES," list Permit No.: 7711A
H. Is this site required to obtain an air federal operating permit?		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	If "YES," list Permit No.: O-2771
I. TCEQ Account Identification Number (if known):		DB-0378-S	
III. FEE INFORMATION			
Check/Money Order/Transaction No.: 573285		Name on Check: Trinity Consultants	Fee Amount: \$900.00



Texas Commission on Environmental Quality
Registration for Air Standard Permit
Form PI-1S

IV. TECHNICAL INFORMATION INCLUDING STATE AND FEDERAL REGULATORY REQUIREMENTS <i>Registrants must be in compliance with all applicable state and federal regulations and standards to claim a Standard Permit.</i>		
A. Is confidential information submitted and properly marked with this registration?	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
B. Is a process flow diagram or a process description attached?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
C. Is a plot plan attached?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
D. Are emissions data and calculations for this claim attached?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
E. Is information attached showing how the general requirements and applicability (30 TAC § 116.610 and 116.615) are met?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
F. Is information attached showing how the specific requirements are met?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
V. SIGNATURE REQUIREMENTS <i>If this project has a capital cost of more than \$2,000,000.00, this application must be submitted under seal of a Registered Texas Professional Engineer (P.E.) or the appropriate exemption is claimed pursuant to the Texas Engineering Practice Act.</i>		
<p>The signature below indicates that I have knowledge of the facts herein set forth and that the same are true and correct to the best of my knowledge and belief. I further state that to the best of my knowledge and belief, the project for which application is made will not in any way violate any provision of the Texas Water Code (TWC), Chapter 7, Texas Clean Air Act (TCAA), as amended, or any of the air quality rules and regulations of the Texas Commission on Environmental Quality or any local governmental ordinance or resolution enacted pursuant to the TCAA. I further state that I have read and understand TWC §§ 7.177-7.183, which defines CRIMINAL OFFENSES for certain violations, including intentionally or knowingly making or causing to be made false material statements or representations in this application, and TWC §§ 7.187, pertaining to CRIMINAL PENALTIES.</p>		
PRINT NAME: <u>David Fuelleman</u>	SIGNATURE: <u></u>	DATE: <u>10-Jan-07</u>
<small>NOTE: ORIGINAL SIGNATURE IN INK IS REQUIRED</small>		
VI. COPIES OF THE REGISTRATION		
Copies must be sent as listed below. Processing delays will occur if copies are not sent as noted.		
Air Permits Initial Review Team (APIRT)	Regular, Certified, Priority Mail MC 161, P.O. Box 13087, Austin, Texas 78711-3087 Hand Delivery, Overnight Mail MC 161, 12100 Park 35 Circle, Building C, Third Floor, Austin, Texas 78753 (512) 239-1250	Original Money Order or Check, a Copy of Form PI-1S and Core Data Form; all attachments
Revenue Section, TCEQ	Regular, Certified, Priority Mail MC 161, P.O. Box 13087, Austin, Texas 78711-3087 Hand Delivery, Overnight Mail MC 161, 12100 Park 35 Circle, Building C, Third Floor, Austin, Texas 78753 (512) 239-1250	Original Money Order or Check, a Copy of Form PI-1S and Core Data Form
Appropriate TCEQ Regional Office	To find your regional office address, go to the TCEQ Web site at www.tceq.state.tx.us , or call (512) 239-1250	Copy of Form PI-1S, Core Data Form, and all attachments
Appropriate Local Air Pollution Control Program(s)	To find your local air pollution control programs go to the TCEQ, APD Web site at www.tceq.state.tx.us/nav/permits/air_permits.html , or call (512) 239-1250	Copy of Form PI-1S, Core Data Form, and all attachments



**Air Quality Standard Permits (SP)
State Pollution Control Project Requirements Checklist
Title 30 Texas Administrative Code §§116.610-116.617**

Electronic Submittal — Complete this document and attach to e-mail along with PI-1S submittal.

Hard-Copy Submittal — Print and complete the following checklist and attach to PI-1S submittal.

Check the most appropriate answer and include any additional information in the spaces provided. If additional space is needed, please include an extra page and reference the rule number. The SP forms, tables, checklists, and guidance documents are available from the TCEQ, Air Permits Division web site at: www.tceq.state.tx.us/permitting/air/nav/standard.html.

This Standard Permit requires registration with the commission's Office of Permitting, Remediation, and Registration in Austin. The facilities and/or changes to facilities can be registered by completing a **Form PI-1S**, "Registration for Air Standard Permit." This checklist should accompany the registration form.

CHECK THE MOST APPROPRIATE ANSWERS AND FILL IN THE BLANKS			
Rule	Questions/Description	Information	Response
116.617	Have you completed the Standard Permit General Requirements Checklist?		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
116.617 (d)(2)(C)	Please list all existing permits and registrations affected by this project and attach a description of how the standard permit will be administratively incorporated into the existing permit(s).	List all existing permits:	
116.617 (a)(1)	Will this project reduce or maintain currently authorized emission rates for facilities authorized by a permit or standard permit?		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
116.617 (b)(5)	If "NO," are any increases solely due to the SP project?		<input type="checkbox"/> YES <input type="checkbox"/> NO
116.617 (a)(3)(A)	Will this project include completely replacing or reconstructing an existing production facility? If "YES," you may not claim this standard permit.		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
116.617 (a)(3)(C)	Will implementing this project serve to return a facility or group of facilities to compliance with an existing authorization or permit? If "YES," you cannot use this SP, you must amend the facility's original permit or authorization.		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
116.617 (a)(1)	Is this pollution control project undertaken voluntarily?		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
116.617 (a)(1)	Is this pollution control project undertaken to meet a governmental standard? If "YES," list governmental standard:		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
116.617 (d)(2)(D)	Will the project result in any changes to currently authorized emission rates? If "YES," attach documentation listing affected EPNs and rate changes.		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

MAY 02 2007



Air Quality Standard Permits (SP)
State Pollution Control Project Requirements Checklist
Title 30 Texas Administrative Code §§116.610-116.617

CHECK THE MOST APPROPRIATE ANSWERS AND FILL IN THE BLANKS			
Rule	Questions/Description	Information	Response
116.617 (a)(2) (A-B)	Are you implementing or changing a method of control? <i>If "YES," have you demonstrated equivalence or improvement in attached documentation?</i>		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
116.617 (a)(2)(C)	Are you substituting a compound in a manufacturing process? <i>If "YES," have you demonstrated equivalence or improvement in attached documentation?</i>		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> YES <input type="checkbox"/> NO
116.617 (b)(2)	Will construction or implementation of the pollution control project begin within 180 days of receiving written acceptance of the registration from the executive director?		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
116.617 (b)(4)	Are predictable maintenance, startup, and shutdown emissions directly associated with the pollution control project included in this project? <i>If "YES," attach documentation showing that MSS was authorized under the existing permit or authorization.</i>		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
116.617 (b)(5)	Are all capacity increases solely due to the project as represented in the registration application? <i>NO</i> <i>If "NO," you may not claim this standard permit.</i>		<input type="checkbox"/> YES <input type="checkbox"/> NO
116.617 (c)(1-3)	Are you replacing emissions control equipment (like-kind replacements or upgrades)? <i>If "NO," skip to next question.</i> <i>If "YES," have you demonstrated equivalence or improvement in attached documentation?</i> Will current testing and record keeping requirements be appropriate for the new control equipment or technique? <i>If "NO," have you attached details of any proposed changes?</i>		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> YES <input type="checkbox"/> NO

MAY 03 2007

3. PERMIT FEE

In accordance with 30 TAC §116.614, a standard permit fee of \$900 has been submitted to the TCEQ. The original check has been mailed to the TCEQ Revenue Section under separate cover. A copy of the check is provided in this section.

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TCEQ PERMITS DIVISION

April 13, 2007

Revenue Section
Texas Commission on Environmental Quality
Mail Code 161, Building C, Third Floor
12100 Park 35 Circle
Austin, TX 78753

RE: *Standard Permit Registration Fee – Pollution Control Project
Building Materials Corporation of America – Dallas Plant – Dallas County
TCEQ Account No. DB-0378-S, CN 600474753, RN 100788959*

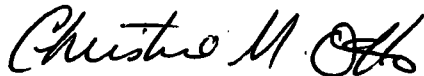
To Whom It May Concern:

Please find in Attachment 1 of this letter a Pollution Control Project Standard Permit registration fee for Building Materials Corporation of America doing business as GAF Materials Corporation (GAF) in the amount of \$900.00 for the Standard Permit registration.

If you have any questions regarding this Standard permit registration fee, please call Mr. Doug Harris of GAF at (214) 637-8909 or me at (972) 661-8100.

Sincerely,

TRINITY CONSULTANTS



Christine M. Otto
Managing Consultant

Attachments

cc: Mr. Tony Walker, TCEQ Regional Office 4
Mr. David Miller, City of Dallas Environmental and Health Services
Mr. Doug Harris, GAF Materials Corp.
Mr. Fred Bright, GAF Materials Corp.
Dr. Chintan Mehta, Trinity Consultants

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CLERK TRINITY



Texas Commission on Environmental Quality
Registration for Air Standard Permit
Form PI-1S

I. REGISTRATION INFORMATION			
A. Is a TCEQ Core Data Form (TCEQ Form No. 10400) attached		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO If "NO," please indicate the following.	
Customer Reference No.: CN600474753		Regulated Entity No.: RN100788959	
B. Company or Other Legal Customer Name (must be same as Core Data "Customer"): Building Materials Corporation			
Company Official Contact Name: David Fuelleman		Title: Plant Manager	
Mailing Address: P. O. Box 655607			
City: Dallas	State: Texas	Zip Code: 75212	
Phone No.: 214-637-1060	Fax No.: 214-637-5202	E-mail: DFuelleman@gaf.com	
C. Technical Contact Name: Jim Hill		Title: Maintenance Manager	
Company: Building Materials Corporation			
Mailing Address: P.O. Box 655607			
City: Dallas	State: Texas	Zip Code: 75212	
Phone No.: 214-637-8985	Fax No.: 214-637-5202	E-mail: JHill@gaf.com	
D. Facility Location Information (Street Address): 2600 Singleton Boulevard			
If no street address, provide written driving directions to the site: (Attach description if additional space is needed.)			
City: Dallas	County: Dallas	Zip Code: 75212	
II. FACILITY AND SITE INFORMATION			
A. Name and Type of Facility:		<input checked="" type="checkbox"/> PERMANENT <input type="checkbox"/> PORTABLE	
B. Type of Action	<input checked="" type="checkbox"/> Initial Application	<input checked="" type="checkbox"/> Change to Registration	Registration No.: 7711A
		<input type="checkbox"/> Renewal	Expiration Date:
C. Standard Permit claimed (check one):		<input checked="" type="checkbox"/> 6001 Pollution Control Project	<input type="checkbox"/> 6002 Oil and Gas Facilities
		<input type="checkbox"/> 6003 MSW Landfill	
<input type="checkbox"/> 6005 Electric Generating Facilities		<input type="checkbox"/> 6007 Permanent Hot Mix Asphalt Plants or Temporary Hot Mix Asphalt Plants	
D. Are you registering a grandfathered facility?		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
E. Is there a previous Standard Exemption or Permit by Rule for the facilities in this registration? (Attach details regarding changes)		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	If "YES," list Registration No.:
			If "YES," list Rule No.:
F. Are there any other facilities at this site which are authorized by an air Standard Permit?		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	If "YES," list Permit No.:
G. Are there any other air preconstruction permits at this site?		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	If "YES," list Permit No.:
H. Is this site required to obtain an air federal operating permit?		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	If "YES," list Permit No.: O-2771
I. TCEQ Account Identification Number (if known):		DB-0378-S	
III. FEE INFORMATION			
Check/Money Order/Transaction No.: 573285		Name on Check: Trinity Consultants	Fee Amount: \$900.00



BEST POSSIBLE IMAGE

Texas Commission on Environmental Quality
Registration for Air Standard Permit
Form PI-1S

IV. TECHNICAL INFORMATION INCLUDING STATE AND FEDERAL REGULATORY REQUIREMENTS		
<i>Registrants must be in compliance with all applicable state and federal regulations and standards to claim a Standard Permit.</i>		
A. Is confidential information submitted and properly marked with this registration?	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
B. Is a process flow diagram or a process description attached?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
C. Is a plot plan attached?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
D. Are emissions data and calculations for this claim attached?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
E. Is information attached showing how the general requirements and applicability (30 TAC § 116.610 and 116.615) are met?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
F. Is information attached showing how the specific requirements are met?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
V. SIGNATURE REQUIREMENTS		
<i>If this project has a capital cost of more than \$2,000,000.00, this application must be submitted under seal of a Registered Texas Professional Engineer (P.E.) or the appropriate exemption is submitted pursuant to the Texas Engineering Exemption Act.</i>		
The signature below indicates that I have knowledge of the facts herein set forth and that the same are true and correct to the best of my knowledge and belief. I further state that to the best of my knowledge and belief, the project for which application is made will not in any way violate any provision of the Texas Water Code (TWC), Chapter 7, Texas Clean Air Act (TCAA), as amended, or any of the air quality rules and regulations of the Texas Commission on Environmental Quality or any local governmental ordinance or resolution enacted pursuant to the TCAA. I further state that I have read and understand TWC §§ 7.177-7.183, which defines CRIMINAL OFFENSES for certain violations, including intentionally or knowingly making or causing to be made false material statements or representations in this application, and TWC §§ 7.187, pertaining to CRIMINAL PENALTIES.		
PRINT NAME: <u>David Fuelleman</u>	SIGNATURE: <u><i>David Fuelleman</i></u>	DATE: <u>10-Jan-07</u>
NOTE: ORIGINAL SIGNATURE IN INK IS REQUIRED		
VI. COPIES OF THE REGISTRATION		
Copies must be sent as listed below. Processing delays will occur if copies are not sent as noted.		
Air Permits Initial Review Team (APIRT)	Regular, Certified, Priority Mail MC 161, P.O. Box 13087, Austin, Texas 78711-3087 Hand Delivery, Overnight Mail MC 161, 12100 Park 35 Circle, Building C, Third Floor, Austin, Texas 78753 (512) 239-1250	Original Money Order or Check, a Copy of Form PI-1S and Core Data Form; all attachments
Revenue Section, TCEQ	Regular, Certified, Priority Mail MC 161, P.O. Box 13087, Austin, Texas 78711-3087 Hand Delivery, Overnight Mail MC 161, 12100 Park 35 Circle, Building C, Third Floor, Austin, Texas 78753 (512) 239-1250	Original Money Order or Check, a Copy of Form PI-1S and Core Data Form
Appropriate TCEQ Regional Office	To find your regional office address, go to the TCEQ Web site at www.tceq.state.tx.us , or call (512) 239-1250	Copy of Form PI-1S, Core Data Form, and all attachments
Appropriate Local Air Pollution Control Program(s)	To find your local air pollution control programs go to the TCEQ, APD Web site at www.tceq.state.tx.us/nav/permits/air_permits.html , or call (512) 239-1250	Copy of Form PI-1S, Core Data Form, and all attachments

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AIR PERMITS DIVISION

ATTACHMENT 1

STANDARD PERMIT FEE CHECK

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PERMITTING DIVISION

4. PROCESS DESCRIPTION

Building Materials Corporation or GAF is a nationwide manufacturer of building material products. The GAF Dallas Plant manufactures asphalt shingles for the roofing industry. A process flow diagram for Lines 1 and 3 asphalt coaters is included in the next Section.

4.1 ASPHALT SHINGLE MANUFACTURING

In the manufacture of asphalt roofing products, a dry non-woven fiberglass mat is fed into the roofing machine from an unwind stand. A mechanical splicer and an accumulator are provided so that the rolls can be fed in sequence by splicing without interruption of the operation. The unwind stand and the accumulator are vented to a dust collector.

The fiberglass mat is next carried through the coating section, where coating asphalt mixed with stabilizer (i.e., limestone) is applied to both surfaces of the mat. The asphalt fumes from this section of the machine from both production lines, are currently vented to a common Electrostatic Precipitator (ESP) and are proposed to be vented to two separate dedicated coalescing filter units; one for each production line.

The coating section is immediately followed by the surfacing section. In the surfacing area, ceramic colored granules are blended and dropped in proper sequence onto the coated web and embedded. The back surface of the sheet is sprinkled with sand to prevent it from adhering to rolls and to itself in the finished package. This area is vented through an assortment of hoods to a dust collector.

The hot sheet, now with a mineralized surface, then goes into the cooling section of the machine. Cooling is achieved by passing the web over a series of water-cooled drums, through water mist sprays and between air jets. It is then accumulated in festoons in the looper section of the machine to provide surge capacity required prior to cutting. Water vapors in these areas are vented to the atmosphere. Asphalt based self-seal striping dots are then applied to the bottom surface of the shingle, and the sheet is cut into shingles and automatically packaged.

4.2 SUPPORT OPERATIONS

There are six major production support operations at the GAF Dallas plant: (1) asphalt storage, (2) asphalt blowing, (3) back surfacing and granule storage, (4) stabilizer storage, (5) stabilizer heating, and (6) stabilizer and coating asphalt mixing.

Air emissions from asphalt storage and asphalt blowing are routed to a thermal oxidizer with a 96 percent destruction efficiency. The thermal oxidizer is directed to a waste heat boiler to produce steam. The waste heat boiler has an auxiliary boiler equipped with a 15 MMBtu/hr natural gas burner that is fired, if necessary to meet the plant's steam production requirements.

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Sand and granules are transferred from the sand storage silo and the granule storage silo to the corresponding sand and granule bins located over the roofing machine. Air emissions from back surfacing storage (i.e., sand) and granule storage are routed to a dust collector as mentioned above.

Stabilizer is received in bulk by truck or railcar and is unloaded into storage silos. Air emissions from the stabilizer storage silos are vented to dust collectors.

Stabilizer in the stabilizer storage silos is conveyed into a stabilizer heater. Air emissions resulting from the heating of the stabilizer are routed to a dust collector. After heating, the stabilizer is conveyed to a mixer where it is mixed with blown coating asphalt. Air emissions from the mixer are routed to a dust collector.

The mixture of heated stabilizer and the coating asphalt is transferred to surge tanks and recirculated through the coater. The emissions from the coater are currently controlled by an ESP. The control efficiency of the ESP is 95 percent. With this standard pollution control project, GAF is proposing to route the asphalt fume emissions from the Line 1 and Line 3 asphalt coaters to separate dedicated coalescing filter units.

4.3 PROPOSED COALESCING FILTER SYSTEM

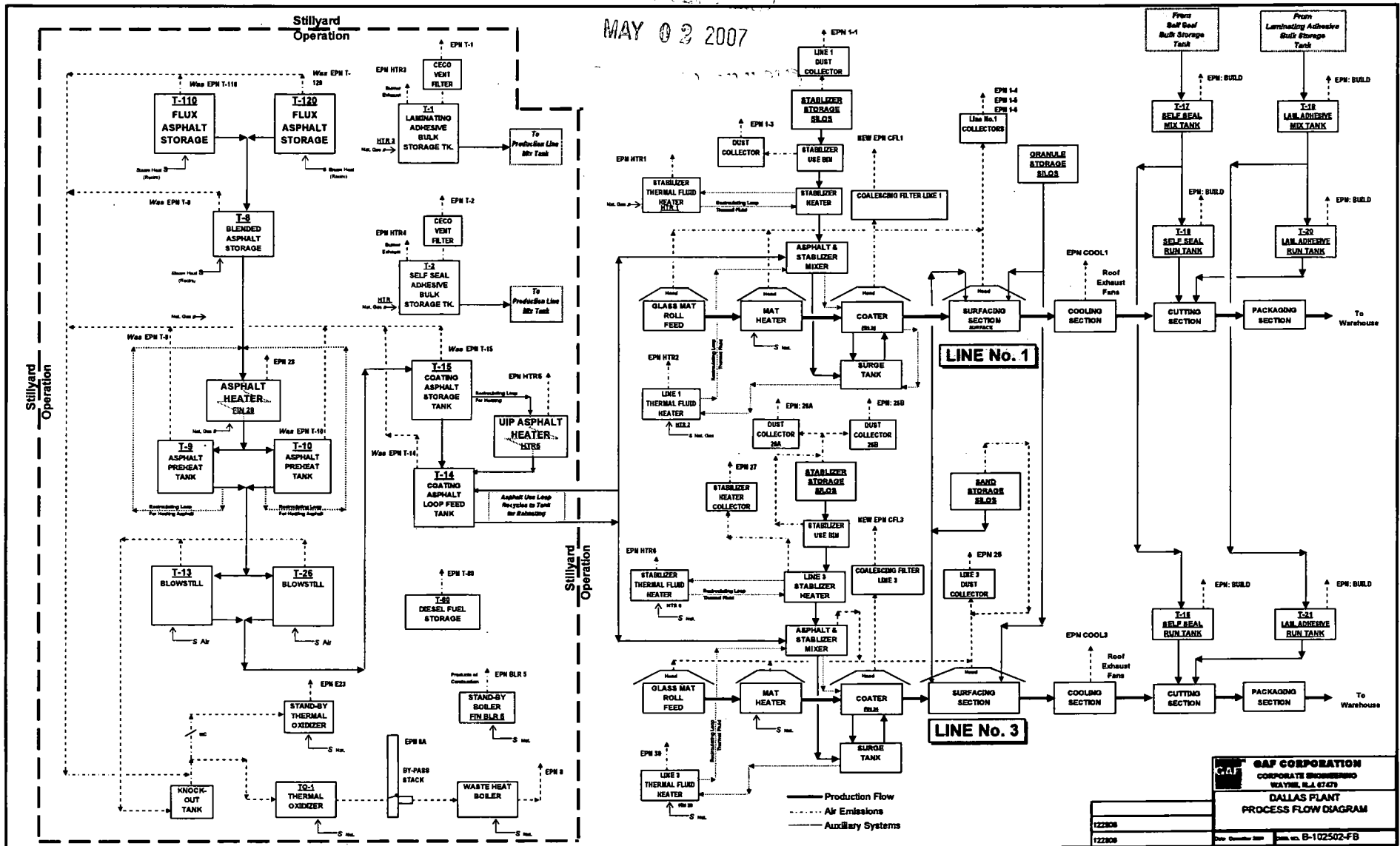
The proposed coalescing filters will consist of a fiber bed mist elimination system used for controlling asphalt aerosol emissions and an exhaust fan with an approximate flow rate of 7,000 acfm. Typical removal efficiency for <3 microns approaches 99.5% by weight. The fiber bed filter system employs highly efficient filtration technology to control liquid and aerosol emissions. These have been used over many years to control emissions effectively and economically.

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5. PROCESS FLOW DIAGRAM

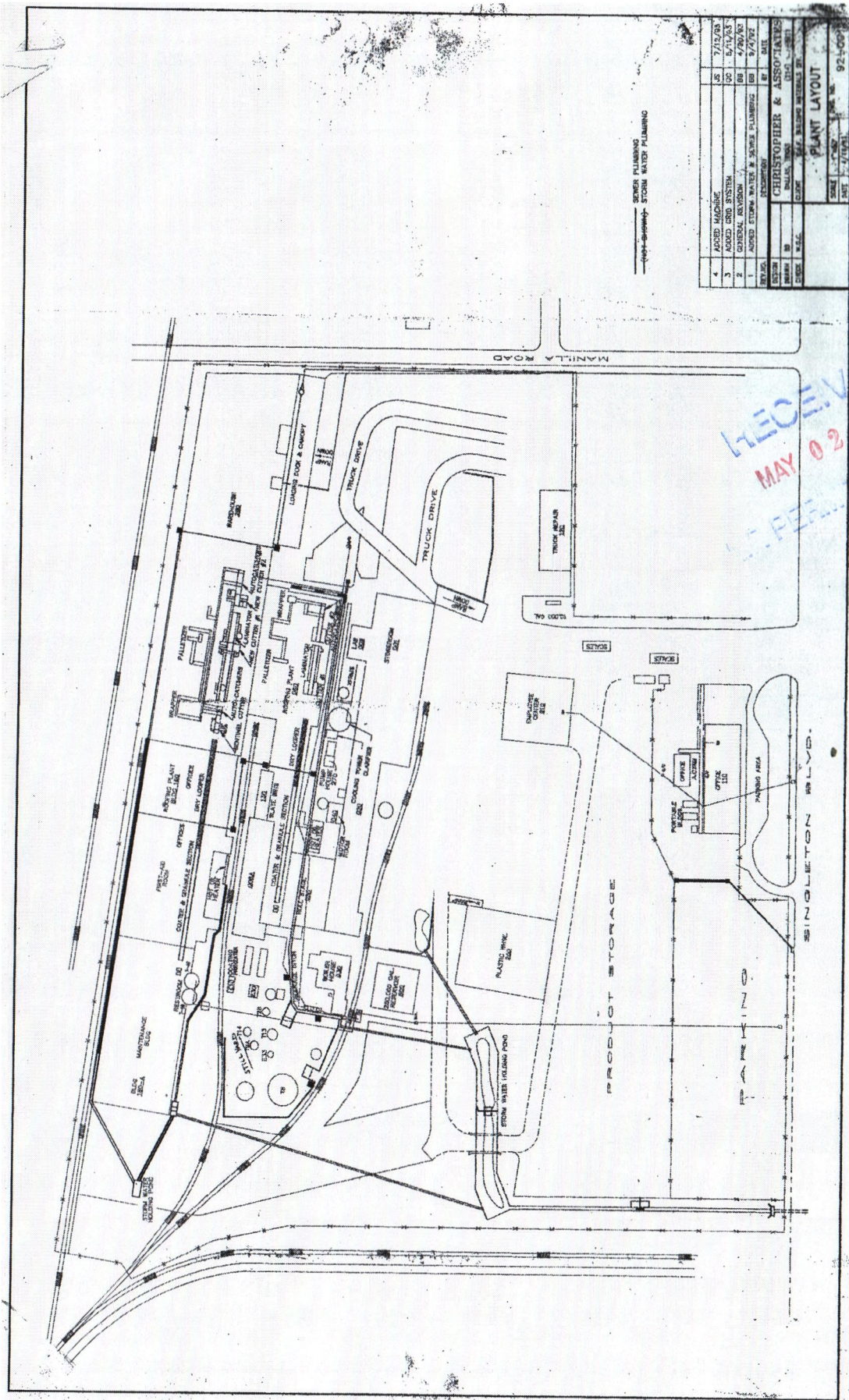
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6. PLOT PLAN

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SEWER PLUMBING
STORM WATER PLUMBING

4	ADD MACHINE	JS	7/12/03
3	ADD DND SYSTEM	JS	5/11/03
2	GENERAL REVISION	JS	4/20/02
1	ADD STORM WATER & SEWER PLUMBING	JS	1/17/02
0	REVISION	JS	1/17/02
CHRISTOPHER & ASSOCIATES			
1000 N. 10TH AVE. SUITE 100			
DALLAS, TEXAS 75201			
PHONE 214-741-1111			
FAX 214-741-1112			
E-MAIL info@christopher-engineers.com			
WWW.christopher-engineers.com			
PLANT LAYOUT			
SHEET NO.	1	TOTAL	92-001

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CITY OF DALLAS

7. EMISSIONS DATA

This section provides the emissions data required by the TCEQ PL-1S. The proposed voluntary pollution control project will not result in an increase in the production capacity. The proposed Coalescing Filter Systems will result in similar or reduced emissions from the Line 1 and Line 3 asphalt coaters. It is proposed that the existing emission point, EPN-34, be replaced with two (2) new emission points (EPN-CFL1 and EPN-CFL3), representing the exhaust vents from the two new coalescing filters.

Stack test data from a similar filter system on an asphalt coater line at GAF's Minneapolis Plant was used for emissions of PM.² The controlled emission factor from the Minneapolis plant's stack test was 0.0002 lb of PM per ton of product produced. Lines 1 and 3 of the GAF Dallas Plant are used to manufacture roofing shingles. Per Permit No. 7711A, the GAF Dallas Plant has a maximum allowable production rate (Line 1 and Line 3 combined) of 171 tons per hour (tph) of finished shingles and 1,498,000 tons per year (tpy) of finished shingles. Utilizing the PM stack test data and the maximum finished product for the site, the hourly and annual emissions from the proposed Coalescing Filter System are estimated as shown below. $\rightarrow 171 \text{ TPH}$

$$PTE_{\text{CoalescingFilterSystem}} = \left(\frac{0.0002 \text{ lb PM}}{\text{ton product produced}} \right) \times 171 \left(\frac{\text{ton product}}{\text{hr}} \right) = 0.034 \left(\frac{\text{lb}}{\text{hr}} \right)$$

$$PTE_{\text{CoalescingFilterSystem}} = 0.034 \left(\frac{\text{lb}}{\text{hr}} \right) \times 8,760 \left(\frac{\text{hr}}{\text{yr}} \right) \times \left(\frac{1 \text{ ton}}{2,000 \text{ lb}} \right) = 0.150 (\text{tpy})$$

on
knowing
that

The stack testing on the Minneapolis Plant did not include VOC. Therefore, GAF is proposing to show the currently authorized VOC emissions from the ESP will be similar to the VOC emissions from the Coalescing Filter System based on emission factors developed for AP-42.

Based on GAF's experience, the VOC emissions from the proposed pollution control project will be lower than the current VOC permitted emissions. This can be further asserted from the AP-42 Section 11.2 Asphalt Roofing. Since the Coalescing Filter System closely resembles the high-energy air filter (HEAF), the VOC emissions factor for the HEAF from the AP-42 Manual was compared to the ESP factor. Table 7-1 compares the emission factors for VOC from the ESP and HEAF.

² Per email correspondence from Mr. Fred Bright (GAF) to Ms. Christine Otto (Trinity Consultants) on November 27, 2006, the controlled emission factor for PM is 0.0002 lbs of pollutant/ton of product produced. This is based on stack testing conducted in 2004 on coalescing filter on coater in the GAF Minneapolis Plant.

³ U.S. EPA, Office of Air Quality Planning and Standard Compilation of Air Pollutant Emission Factors, (Volume 1, Fifth Edition), Section 11.2, Table 11.2-4 Emission Factors for Asphalt Roofing, January 1995.

TABLE 7-1. EMISSION FACTORS FOR ASPHALT ROOFING

Process	TOC ^a (lb/ton finished product)
Shingle saturation: dip saturator, drying-in drum section, wet looper, and coater with ESP (SCC 3-05-001-16)	0.098 <i>→ SAME?</i>
Shingle saturation: dip saturator, drying-in drum section, and wet looper with HEAF (SCC 3-05-001-18)	0.094

^a Total organic compounds as measured with an EPA Method 25A (or equivalent) sampling train.

As seen from the above table, the AP-42 emission factors are slightly less for the HEAF when compared with an ESP. Therefore, GAF expects that upon completion of the proposed pollution control project, the VOC emissions will show similar trends with AP-42 and will result in VOC emissions less than those currently emitted by the ESP. Thus, GAF would like to maintain the total allowable VOC emissions as stipulated in the April 2006 permit amendment application.⁴ GAF is willing to conduct stack testing once the proposed pollution abatement equipment is in operation to demonstrate compliance with the permit limits.

As the asphalt is processed in the coating operation, the asphalt fumes will be controlled by the two proposed coalescing filters. GAF is proposing that the emissions from the Line 1 and Line 3 Coalescing Filter Systems be based on prorated values from the current permit allowable for the Electrostatic Precipitator (EPN-34) as shown in Tables 7-2 and 7-3. Emissions from routine maintenance, start-up, and shutdown (MSS) from the Asphalt Coaters are not expected to be different than normal operations.

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⁴ TCEQ Air Quality Permit Amendment Application for GAF Materials Corporation (Dallas Plant), submitted to TCEQ on April 5, 2006.

TABLE 7-2. CURRENT ELECTROSTATIC PRECIPITATOR HOURLY EMISSIONS

Current Control Device	PM ₁₀	VOC*
Electrostatic Precipitator (EPN-34)	3.43 lb/hr 15.02 <i>ppm</i>	5.76 lb/hr 25.23 <i>ppm</i>

* The VOC emissions are referenced in the Permit Amendment Application submitted to the TCEQ in April 2006.

→ in name table
in NSN
any.

TABLE 7-3. PROPOSED EMISSIONS FOR LINE 1 AND LINE 3 COALESCING FILTER SYSTEMS

Production Line	Permitted Asphalt Usage (lb/hr)	% of Total Asphalt Usage	PM ₁₀	VOC
Line 1 Asphalt Coater	24,886	37.5 %	1.29	2.16
Line 3 Asphalt Coater	41,472	62.5 %	2.14	3.60
Total	66,358	100.0 %	3.43	5.76

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8. GENERAL REQUIREMENTS

This section provides a summary demonstration that the proposed pollution control project at GAF will meet all requirements of 30 TAC §116.610 and §116.615.

8.1 30 TAC §116.610. APPLICABILITY EFFECTIVE FEBRUARY 1, 2006

- (a) Under the Texas Clean Air Act, §382.051, a project that meets the requirements for a standard permit listed in this subchapter or issued by the commission is hereby entitled to the standard permit, provided the following conditions listed in this section are met. For the purposes of this subchapter, project means the construction or modification of a facility or a group of facilities submitted under the same registration.

- (1) Any project which results in a net increase in emissions of air contaminants from the project other than carbon dioxide, water, nitrogen, methane, ethane, hydrogen, oxygen, or those for which a national ambient air quality standard has been established must meet the emission limitations of §106.261 of this title (relating to Facilities (Emission Limitations), unless otherwise specified by a particular standard permit.

The emissions limitations of 30 TAC §106.261 do not apply to the proposed pollution control project pursuant to 30 TAC §116.617(b)(3).

- (2) Construction or operation of the project must be commenced prior to the effective date of a revision to this subchapter under which the project would no longer meet the requirements for a standard permit.

Construction and operation of the proposed pollution control project will be commenced prior to the effective date of a revision to this subchapter so that the requirements for the standard permit are met.

- (3) The proposed project must comply with the applicable provisions of the Federal Clean Air Act, §111 (concerning New Source Performance Standards) as listed under 40 Code of Federal Regulations (CFR) Part 60, promulgated by the United States Environmental Protection Agency (EPA).

Line 3 of the GAF Dallas Plant is applicable to NSPS UU Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture. GAF will comply with all requirements.

- (4) The proposed project must comply with the applicable provisions of FCAA, §112 (concerning Hazardous Air Pollutants) as listed under 40 CFR 61, promulgated by the EPA.

The proposed project is not subject to any National Emission Standard for Hazardous Air Pollutants (NESHAP) codified in 40 CFR 61.

- (5) The proposed project must comply with the applicable maximum achievable control technology standards as listed under 40 CFR Part 63, promulgated by the EPA under FCAA, §112 or as listed under Chapter 113, Subchapter C of this title (relating to National Emissions Standards for Hazardous Air Pollutants for Source Categories (FCAA §112, 40 CFR 63)).

The proposed pollution control project is not subject to any NESHAP codified in 40 CFR 63.

- (6) If subject to Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program) the proposed facility, group of facilities, or account must obtain allocations to operate.

GAF, including the proposed pollution control project, is not subject to the requirements of 30 TAC Chapter 101, Subchapter H, Division 3.

- (b) Any project that constitutes a new major stationary source or major modification as defined in §116.12 of this title (relating to Nonattainment and Prevention of Significant Deterioration Review Definitions) is subject to the requirements of §116.110 of this title (relating to Applicability) rather than this subchapter.

The proposed pollution control project does not constitute a new major stationary source or major modification as defined in §116.12. Therefore, this project is not subject to the requirements of 30 TAC §116.110.

- (c) Persons may not circumvent by artificial limitations the requirements of §116.110 of this title.

Artificial limitations have not been used to circumvent the requirements of §116.110.

- (d) Any project involving a proposed affected source (as defined in §116.15(1) of this title (relating to Section 112(g) Definitions)) shall comply with all applicable requirements under Subchapter E of this chapter (relating to Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources (FCAA, §112(g), 40 CFR Part 63)). Affected sources subject to Subchapter E of this chapter may use a standard permit under this subchapter only if the terms and conditions of the specific standard permit meet the requirements of Subchapter E of this chapter.

The proposed pollution control project does not have the potential to emit 10 tpy of any hazardous air pollutant (HAP) or 25 tpy of any combination of HAPs. Therefore, the requirements of Subchapter E of 30 TAC 116 are not applicable to this project.

8.2 30 TAC §116.615. GENERAL CONDITIONS

EFFECTIVE SEPTEMBER 12, 2002

The following general conditions are applicable to holders of standard permits, but will not necessarily be specifically stated within the standard permit document.

- (1) Protection of public health and welfare. The emissions from the facility, including dockside vessel emissions, must comply with all applicable rules and regulations of the commission adopted under Texas Health and Safety Code, Chapter 382, and with intent of the TCAA, including protection of health and property of the public.

This project represents a voluntary pollution control project that will potentially lower actual emissions for a facility previously authorized by TCEQ permit, thereby ensuring the protection of public health and welfare. This standard permit registration documents that the proposed project will comply with the rules and regulations of the TCEQ and the intent of the TCAA.

- (2) Standard permit representations. All representations with regard to construction plans, operating procedures, and maximum emission rates in any registration for a standard permit become conditions upon which the facility or changes thereto, must be constructed and operated. It is unlawful for any person to vary from such representations if the change will affect that person's right to claim a standard permit under this section. Any change in condition such that a person is no longer eligible to claim a standard permit under this section requires proper authorization under §116.110 of this title (relating to Applicability). If the facility remains eligible for a standard permit, the owner or operator of the facility shall notify the executive director of any change in conditions which will result in a change in the method of control of emissions, a change in the character of the emissions, or an increase in the discharge of the various emissions as compared to the representations in the original registration or any previous notification of a change in representations. Notice of changes in representations must be received by the executive director no later than 30 days after the change.

GAF understands that standard permit representations become conditions upon which the facility must be operated. Any changes to the representations in this application will be communicated to the TCEQ.

- (3) Standard permit in lieu of permit amendment. All changes authorized by standard permit to a facility previously permitted under §116.110 of this title (relating to Applicability) shall be administratively incorporated into that facility's permit at such time as the permit is amended or renewed.

GAF will provide information sufficient to incorporate this Standard Permit into TCEQ Permit No. 7711A at the time of renewal or amendment.

- (4) Construction progress. Start of construction, construction interruptions exceeding 45 days, and completion of construction shall be reported to the appropriate regional office not later than 15 working days after occurrence of the event, except where a different time period is specified for a particular standard permit.

GAF will notify the appropriate TCEQ Regional Office of construction progress as required.

- (5) Start-up notification.

(A) The appropriate air program regional office of the commission and any other air pollution control program having jurisdiction shall be notified prior to the commencement of operations of the facilities authorized by a standard permit in such a manner that a representative of the executive director may be present.

(B) For phased construction, which may involve a series of units commencing operations at different times, the owner or operator of the facility shall provide separate notification for the commencement of operations for each unit.

(C) Prior to beginning operations of the facilities authorized by the permit, the permit holder shall identify to the Office of Permitting, Remediation, and Registration the source or sources of allowances to be utilized for compliance with Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program).

(D) A particular standard permit may modify start-up notification requirements.

GAF will provide start-up notification as required by the Standard Permit.

- (6) Sampling requirements. If sampling of stacks or process vents is required, the standard permit holder shall contact the Office of Air Quality and any other air pollution control program having jurisdiction prior to sampling to obtain the proper data forms and procedures. All sampling and testing procedures must be approved by the executive director and coordinated with the regional representatives of the commission. The standard permit holder is also responsible for providing sampling facilities and conducting the sampling operations or contracting with an independent sampling consultant.

If stack sampling is required by the executive director, GAF will comply with these stack sampling requirements.

- (7) Equivalency of methods. The standard permit holder shall demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods, and monitoring methods proposed as alternatives to methods indicated in the conditions of the standard permit. Alternative methods must be applied for in writing and must be

reviewed and approved by the executive director prior to their use in fulfilling any requirements of the standard permit.

GAF is not requesting any alternatives to emissions control methods, sampling or other emission testing methods, and monitoring methods indicated in the conditions of the standard permit. GAF understands that if changes are proposed, equivalency of methods will be required.

- (8) Recordkeeping. A copy of the standard permit along with information and data sufficient to demonstrate applicability of and compliance with the standard permit shall be maintained in a file at the plant site and made available at the request of representatives of the executive director, the EPA, or any air pollution control program having jurisdiction. For facilities that normally operate unattended, this information shall be maintained at the nearest staffed location within Texas specified by the standard permit holder in the standard permit registration. This information must include, but is not limited to, production records and operating hours. Additional recordkeeping requirements may be specified in the conditions of the standard permit. Information and data sufficient to demonstrate applicability of and compliance with the standard permit must be retained for at least two years following the date that the information or data is obtained. The copy of the standard permit must be maintained as a permanent record.

GAF will maintain records as required by the Standard Permit and make them available to representatives of the executive director, the EPA, or any local pollution control program.

- (9) Maintenance of emission control. The facilities covered by the standard permit may not be operated unless all air pollution emission capture and abatement equipment is maintained in good working order and operating properly during normal facility operations. Notification for emissions events and scheduled maintenance shall be made in accordance with §101.201 and §101.211 of this title (relating to Emissions Event Reporting and Recordkeeping Requirements; and Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping).

GAF will maintain the air pollution capture and abatement equipment for the facilities covered by this standard permit in good working order and will operate the air pollution capture and abatement equipment properly during normal facility operations. Notifications under 30 TAC § 101.201 and §101.211 will be made, as appropriate.

- (10) Compliance with rules. Registration of a standard permit by a standard permit applicant constitutes an acknowledgment and agreement that the holder will comply with all rules, regulations, and orders of the commission issued in conformity with the TCAA and the conditions precedent to the claiming of the standard permit. If more than one state or federal rule or regulation or permit condition is applicable, the most stringent limit or condition shall govern. Acceptance includes consent to the entrance of commission employees and designated representatives of any air pollution control program having jurisdiction into the

permitted premises at reasonable times to investigate conditions relating to the emission or concentration of air contaminants, including compliance with the standard permit.

GAF will comply will all rules, regulations, and orders of the commission

9. SPECIFIC REQUIREMENTS

This section provides a summary demonstration that the proposed pollution control project at GAF will meet all requirements of 30 TAC §116.617.

9.1 30 TAC §116.617. STATE POLLUTION CONTROL PROJECT STANDARD PERMIT (EFFECTIVE FEBRUARY 1, 2006)

(a) Scope and applicability.

- (1) This standard permit applies to pollution control projects undertaken voluntarily or as required by any governmental standard, which reduce or maintain currently authorized emission rates for facilities authorized by a permit, standard permit, or permit by rule.

GAF is voluntarily implementing this proposed pollution control project to replace the current ESP with the Coalescing Filter Systems. The proposed project is expected to reduce or maintain currently authorized emission rates for previously authorized emissions.

- (2) The project may include:
- (A) the installation or replacement of emissions control equipment;
 - (B) the implementation or change to control techniques; or
 - (C) the substitution of compounds used in manufacturing processes.

This pollution control project proposes to install pollution control equipment that will potentially result in maintaining or reducing the current authorized emissions.

- (3) This standard permit must not be used to authorize the installation of emission control equipment or the implementation of a control technique that:
- (A) constitutes the complete replacement of an existing production facility or reconstruction of a production facility as defined in 40 Code of Federal Regulations §60.15(b)(1) and (c); or

The proposed pollution control project does not include the installation of a new production facility, reconstruction of a production facility, or the complete replacement of an existing production facility.

- (B) the executive director determines there are health effects concerns or the potential to exceed a national ambient air quality standard criteria pollutant or contaminant that results from an increase in emissions of any air contaminant until those concerns are addressed by the registrant to the satisfaction of the executive director; or

The implementation of the proposed pollution control project will maintain or reduce the previously authorized emissions and is not expected to increase authorized emissions of any other criteria pollutants. Therefore, there is no potential to exceed an ambient air quality standard as a result of the project.

(C) returns a facility or group of facilities to compliance with an existing authorization or permit unless authorized by the executive director.

GAF is currently in compliance with NSR Permit No. 7711A; therefore this paragraph does not apply.

- (4) Only new or modified pollution control projects must meet the conditions of this standard permit. All previous standard permit registrations under this section that were authorized prior to the effective date of this rule must include the increases and decreases in emissions resulting from those projects in any future netting calculation and all other conditions must be met upon the ten-year anniversary and renewal of the original registration, or until administratively incorporated into the facilities' permit, if applicable.

The proposed project is a new pollution control project and meets the conditions of this standard permit.

(b) General requirements.

- (1) Any claim under this standard permit must comply with all applicable conditions of:

(A) §116.604(1) and (2) of this title (relating to Duration and Renewal of Registrations to Use Standard Permits);

GAF will comply with the renewal requirements in §116.604(1) and (2).

(B) §116.605(d)(1) and (2) of this title (relating to Standard Permit Amendment and Revocation);

GAF will comply with any amendments to the Standard Permit.

(C) §116.610 of this title (relating to Applicability);

GAF meets the conditions of §116.610 as shown in the previous Section of this application.

(D) §116.611 of this title (relating to Registration to Use a Standard Permit);

This document represents the registration to use a Standard Permit and contains all of the required elements set forth in §116.611.

(E) §116.614 of this title (relating to Standard Permit Fees); and

GAF has submitted the Standard Permit fee under separate cover. A copy of the check is included in this application.

(F) §116.615 of this title (relating to General Conditions).

GAF understands the conditions of §116.615 are General Conditions of the Standard Permit and will comply with the applicable requirements as shown in the previous Section of this application.

- (2) Construction or implementation of the pollution control project must begin within 18 months of receiving written acceptance of the registration from the executive director, with one 18-month extension available, and must comply with §116.115(b)(2) and §116.120 of this title (relating to General and Special Conditions and Voiding of Permits). Any changes to allowable emission rates authorized by this section become effective when the project is complete and operation or implementation begins.

GAF will begin construction and implementation of the pollution control project within 18 months of acceptance of this registration or will request an 18-month extension. In addition, GAF will comply with the Conditions of §116.115(b)(2) and §116.120.

- (3) The emissions limitations of §116.610(a)(1) of this title do not apply to this standard permit.

GAF understands that the requirements of 30 TAC §116.610(a)(1) are not applicable to this standard permit.

- (4) Predictable maintenance, startup, and shutdown emissions directly associated with the pollution control projects must be included in the representations of the registration application.

GAF does not anticipate an increase in allowable emissions or change in the character of the emissions during predictable maintenance, startup or shutdown (MSS) associated with the facilities directly associated with the pollution control project. Therefore, predictable MSS emissions are not separately quantified in this application.

- (5) Any increases in actual or allowable emission rates or any increase in production capacity authorized by this section (including increases associated with recovering lost production capacity) must occur solely as a result of the project as represented in the registration application. Any increases of production associated with a pollution

control project must not be utilized until an additional authorization is obtained. This paragraph is not intended to limit the owner or operator's ability to recover lost capacity caused by a derate, which may be recovered and used without any additional authorization.

There are no increases in emission rates represented in this pollution control project standard permit and there will be no increases of production as a result of the proposed project.

(c) Replacement projects.

- (1) The replacement of emissions control equipment or control technique under this standard permit is not limited to the method of control currently in place, provided that the control or technique is at least as effective as the current authorized method and all other requirements of this standard permit are met.
- (2) The maintenance, startup, and shutdown emissions may be increased above currently authorized levels if the increase is necessary to implement the replacement project and maintenance, startup, and shutdown emissions were authorized for the existing control equipment or technique.
- (3) Equipment installed under this section is subject to all applicable testing and recordkeeping requirements of the original control authorization. Alternate, equivalent monitoring, or records may be proposed by the applicant for review and approval of the executive director.

GAF is proposing to replace the existing ESP emission control equipment with the proposed Coalescing Filter Systems. The replaced control equipment will be at least as effective as or better than the current authorized control equipment. GAF will meet all the requirements for this standard permit.

(d) Registration requirements.

- (1) A registration must be submitted in accordance with the following.
 - (A) If there are no increases in authorized emissions of any air contaminant resulting from a replacement pollution control project, a registration must be submitted no later than 30 days after construction or implementation begins and the registration must be accompanied by a \$900 fee.

GAF is proposing to replace the existing ESP emission control equipment with the proposed Coalescing Filter Systems. Although only required to submit a replacement pollution control project 30 days after construction begins for projects that do not result in an increase in emissions, GAF is submitting this registration and

fee for the pollution control project at least 30 days prior to construction and implementation of the pollution control project for TCEQ approval.

(B) If a new control device or technique is authorized or if there are increases in authorized emissions of any air contaminant resulting from the pollution control project, a registration must be submitted no later than 30 days prior to construction or implementation. The registration must be accompanied by a \$900 fee. Construction or implementation may begin only after:

- (i) no written response has been received from the executive director within 30 calendar days of receipt by the Texas Commission on Environmental Quality (TCEQ); or
- (ii) written acceptance of the pollution control project has been issued by the executive director.

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GAF proposes to replace the existing control equipment with the proposed Coalescing Filter Systems as mentioned in Section 9.1(d)(1)(A) above. Therefore, the provisions of this paragraph do not apply.

(C) If there are any changes in representations to a previously authorized pollution control project standard permit for which there are no increases in authorized emissions of any air contaminant, a notification or letter must be submitted no later than 30 days after construction or implementation of the change begins. No fee applies and no response will be sent from the executive director.

This registration is for a replacement pollution control project. GAF will submit a notification letter to the TCEQ within 30 days if changes to the pollution control project are required and do not result in an increase in air emissions.

(D) If there are any changes in representations to a previously authorized pollution control project standard permit that also increase authorized emissions of any air contaminant resulting from the pollution control project, a registration alteration must be submitted no later than 30 days prior to the start of construction or implementation of the change. The registration must be accompanied by a \$450 fee, unless received within 180 days of the original registration approval. Construction or implementation may begin only after:

- (i) no written response has been received from the executive director within 30 calendar days of receipt by the TCEQ; or
- (ii) written acceptance of the pollution control project has been issued by the executive director.

This registration is for a replacement pollution control project. GAF will submit a registration alteration, and \$450 fee, if applicable, to the TCEQ 30 days prior to a change in the pollution control project that results in an increase in air emissions.

GAF understands that construction of the change to the proposed pollution control project is authorized to commence after written approval notification is received from the TCEQ, or 30 days after the TCEQ receives the registration alteration, if GAF is not informed of any objections.

- (2) The registration must include the following:
- (A) a description of process units affected by the project;
 - (B) a description of the project;
 - (C) identification of existing permits or registrations affected by the project;
 - (D) quantification and basis of increases and/or decreases associated with the project, including identification of affected existing or proposed emission points, all air contaminants, and hourly and annual emissions rates;
 - (E) a description of proposed monitoring and recordkeeping that will demonstrate that the project decreases or maintains emission rates as represented; and
 - (F) a description of how the standard permit will be administratively incorporated into the existing permit(s).

This registration application contains the required information, as indicated above.

- (e) Operational requirements. Upon installation of the pollution control project, the owner or operator shall comply with the requirements of paragraphs (1) and (2) of this subsection.
- (1) General duty. The owner or operator must operate the pollution control project in a manner consistent with good industry and engineering practices and in such a way as to minimize emissions of collateral pollutants, within the physical configuration and operational standards usually associated with the emissions control device, strategy, or technique.

GAF will operate the pollution control equipment in accordance with good industry and engineering practice in order to minimize the emissions of collateral pollutants.

- (2) Recordkeeping. The owner or operator must maintain copies on site of monitoring or other emission records to prove that the pollution control project is operated consistent with the requirements in paragraph (1) of this subsection, and the conditions of this standard permit.

GAF will maintain records of any monitoring conducted to demonstrate that the pollution control project is operated in a manner consistent with good industry practices and in a way that tries to minimize emissions of collateral pollutants. In addition, the plant will maintain records to demonstrate compliance with this Standard Permit.

- (f) Incorporation of the standard permit into the facility authorization.

- (1) Any new facilities or changes in method of control or technique authorized by this standard permit instead of a permit amendment under §116.110 of this title (relating to Applicability) at a previously permitted or standard permitted facility must be incorporated into that facility's permit when the permit is amended or renewed.

GAF will incorporate this Standard Permit into NSR Permit No. 7711A at amendment or renewal as directed by the TCEQ.

- (2) All increases in previously authorized emissions, new facilities, or changes in method of control or technique authorized by this standard permit for facilities previously authorized by a permit by rule must comply with §106.4 of this title (relating to Requirements for Permitting by Rule), except §106.4(a)(1) of this title, and §106.8 of this title (relating to Recordkeeping).

This is a replacement pollution control project with emissions previously authorized under NSR Permit No. 7711A. Therefore, the provisions of §106.4 (relating to Requirements for Permitting by Rule) do not apply.